Plaintiffs' Exhibit 106

CONFIDENTIAL

1   UNITED STATES DISTRICT COURT

2   NORTHERN DISTRICT OF CALIFORNIA

3

4

5   IN RE: FACEBOOK, INC.   MDL No. 2843

6   CONSUMER PRIVACY USER   Case No. 18-md-02843-VC-JSC

7   PROFILE LITIGATION

8   ------------------------/

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15   REMOTE DEPOSITION OF JACKIE CHANG

16   Thursday, December 16, 2021

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22   Job No. 4976949

23   Reported Remotely and Stenographically by:

24   JANIS JENNINGS, CSR No. 3942, CLR, CCRR

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8             REMOTE DEPOSITION OF JACKIE CHANG, located

9      in Hillsborough, California, taken on behalf of the

10     Plaintiffs, beginning at 9:43 a.m., on Thursday,

11     December 16, 2021, sworn remotely by Janis Jennings,

12     Certified Shorthand Reporter No. 3942, CLR, CCRR,

13     located in the City of Walnut Creek, County of

14     Contra Costa, State of California.

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 1       REMOTE APPEARANCES:

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2

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15   Also Remotely Present:

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20

21   IAN CHEN, ESQ., Facebook, Inc.

22   SHAWNA HAYNES, Videographer

23

24

25

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10                    FB-CA-MDL-02187146 - 2187149

11        Exhibit 4   Email thread dated 5/3/13 from Marie    71

12                    Hagman Re: FQL question;

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16                    3.0 2nd rev;

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18        Exhibit 6   Platform 3.0;                           88

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12                     Cross Re: P3.0 Rollout Planning;

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 6                     Requirements post-PS12n &

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10                     Product Partnerships:  Bi-Weekly

11                     Update;

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13        Exhibit 25   New York Times article "Facebook       270

14                     Gave Device Makers Deep Access to

15                     Data on Users and Friends"

16        Exhibit 26   Email thread dated 8/28/14 from        273

17                     Charlotte Edelson Subject: Head

18                     Partner Apps: Proactive Policy

19                     Review;

20                     FB-CA-MDL-00220376 - 220377

21        Exhibit 27   Quip Business Portal - Messages for    280

22                     WSUAAAHa3pE;

23                     FB-CA-MDL-01198438 - 1198446

24        Exhibit 28   Message summary dated 10/16/19 from    287

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1	THURSDAY, DECEMBER 16, 2021; 9:43 A.M.	
2		
3		
4	THE VIDEOGRAPHER: Good morning. We are	
5	going on the record at 9:43 a.m. on December 16th,	09:43
6	2021. Please note that the microphones may pick up	09:43
7	background noise, private conversations and	09:43
8	interference if unmuted. When muted, remember to	09:43
9	unmute to speak on the record. Audio and video	09:44
10	recording will continue to take place unless all	09:44
11	parties agree to go off the record.	09:44
12	This is media unit 1 of the video recorded	09:44
13	deposition of Jackie Chang taken by counsel for	09:44
14	plaintiff in the matter of In Re Facebook, Inc.	09:44
15	Consumer Privacy User Profile Litigation, all	09:44
16	related actions, filed in the United States	09:44
17	District Court, Northern District of California,	09:44
18	MDL No. 2843, case No. 18-md-02843-VC-JSC.	09:44
19	This deposition is being conducted via	09:44
20	Veritext Virtual Zoom Technology and all parties are	09:44
21	appearing remotely. My name is Shawna Haynes from	09:44
22	the firm Veritext Legal Solutions and I'm the	09:44
23	videographer. The court reporter is Janis Jennings	09:45
24	from the firm Veritext Legal Solutions. I am not	09:45
25	related to any party in this action, nor am I	09:45

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1	financially interested in the outcome.	09:45
2	Counsel and everyone attending remotely will	09:45
3	state their appearances and affiliations for the	09:45
4	record. If there are any objections to proceeding,	09:45
5	please state them at the time of your appearance	09:45
6	beginning with the noticing attorney.	09:45
7	MR. LOESER: Good morning. My name is Derek	09:45
8	Loeser for the plaintiffs from the firm of Keller	09:45
9	Rohrback.	
10	MS. WEAVER: Good morning. This is Lesley	09:45
11	Weaver from Bleichmar Fonti. With me is Matt	09:45
12	Melamed and Anne Davis, also of my firm, on behalf	09:45
13	of plaintiffs. Good morning, everybody.	09:45
14	MR. LOESER: And I also have Adele Daniel	09:45
15	from Keller Rohrback.	09:45
16	MR. FALCONER: Good morning. This is Russ	09:46
17	Falconer, with Gibson Dunn & Crutcher, here on	09:46
18	behalf of the defendant and on behalf of the	09:46
19	witness. I'm here with my colleagues Laura Mumm and	09:46
20	Colin Davis, as well as Ian Chen from Facebook.	09:46
21	SPECIAL MASTER GARRIE: Last, Daniel Garrie	09:46
22	with JAMS. I'm the special master.	09:46
23	THE VIDEOGRAPHER: Okay. Anyone else?	09:46
24	Thank you. Will the court reporter please	09:46
25	swear in the witness.	09:46

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 1                          JACKIE CHANG,

 2              the witness herein, was sworn and

 3              testified as follows:

 4                                                    09:46

 5              DEPOSITION REPORTER:   Thank you.      09:46

 6              Please begin, Counsel.                09:46

 7

 8                          EXAMINATION               09:46

 9    BY MR. LOESER:                                  09:46

10       Q.   Good morning, Miss Chang.  Could you please  09:46

11    state and spell your last name for the record?  09:46

12       A.   Chang, C-h-a-n-g.                       09:46

13       Q.   Miss Chang, have you ever had your      09:46

14    deposition taken before?                        09:47

15       A.   No.                                     09:47

16       Q.   Okay.  Well, there are some ground rules  09:47

17    that make the -- that really are designed to make  09:47

18    the record clear.  The first is that we should try  09:47

19    not to talk over each other.  I will ask a question.  09:47

20    I'll try to ask a clear question.  If you don't  09:47

21    understand the question, please ask me to restate  09:47

22    it.  And if you answer the question, I will assume  09:47

23    that you understood the question.                09:47

24              Is that okay?                          09:47

25       A.   Yes.                                     09:47
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1	Q. And, again, we need to try not to speak at	09:47
2	the same time because it tortures the court	09:47
3	reporter. She can't take down our testimony if we	09:47
4	are talking over each other.	09:47
5	If at any point you need to take a break,	09:47
6	please let me know. I may finish asking a few	09:47
7	questions but, of course, if you would like to take	09:47
8	a break, we will make sure to allow you to take	09:47
9	breaks.	09:47
10	During the testimony, your counsel may	09:47
11	interpose objections and he has every right to do	09:47
12	that. You should answer the question unless you're	09:47
13	instructed not to do so by your counsel.	09:47
14	Do you understand that?	09:47
15	A. Yes.	09:48
16	Q. And you understand that your obligation here	09:48
17	today is to testify honestly and truthfully?	09:48
18	A. Yes.	09:48
19	Q. And that you are under oath?	09:48
20	A. Yes.	09:48
21	Q. Your testimony today is going to cover the	09:48
22	time period from 2007 through 2021. Do you	09:48
23	understand that?	09:48
24	A. Yes.	09:48
25	Q. And that will be the time period that's	09:48

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1	covered unless I specifically state otherwise.	09:48
2	Okay?	09:48
3	A. Yes.	09:48
4	MR. LOESER: I'm going to show you what will	09:48
5	be marked as Exhibit No. 1 and that is your	09:48
6	deposition notice. And bear with us while we work	09:48
7	out the clunkiness of the platform here. We are	09:48
8	going to get the document up so you can see it, and	09:48
9	it will also be published via Veritext platform. So	09:48
10	it will be on a screen with the screen share, but	09:48
11	also you will have access to the document via the	09:48
12	Veritext platform.	09:48
13	(Exhibit 1 marked for identification.)	09:49
14	MR. LOESER: We need -- in the world of	09:49
15	Zoom, things always start interestingly. We need to	09:49
16	enable screen sharing so that we can do that.	09:49
17	THE VIDEOGRAPHER: It's enabled now.	09:49
18	BY MR. LOESER:	09:49
19	Q. Miss Chang, this is the deposition notice	09:49
20	that requires your attendance. Have you seen this	09:49
21	before?	09:49
22	A. No.	09:49
23	Q. Do you understand that you're testifying	09:49
24	today in response to a subpoena directing you to	09:49
25	appear to have your deposition taken?	09:49

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1	MR. FALCONER: Objection. Foundation.	09:49
2	Go ahead.	09:49
3	THE WITNESS: Sorry. Can you repeat the	09:49
4	question?	09:49
5	BY MR. LOESER:	09:49
6	Q. Sure. Do you understand that your testimony	09:49
7	today is being taken in response to a subpoena that	09:49
8	requires your -- a deposition notice that requires	09:49
9	your attendance?	09:50
10	A. Yes.	09:50
11	MR. LOESER: We can stop sharing that.	09:50
12	BY MR. LOESER:	09:50
13	Q. Miss Chang, what did you do to prepare today	09:50
14	for your deposition?	09:50
15	A. I met with counsel, Mr. Falconer and Miss	09:50
16	Mumm and Mr. Chen, and I can't remember the other	09:50
17	one.	09:50
18	Q. And how many times did you meet with them?	09:50
19	A. I met with them about three times.	09:50
20	Q. And for how much time each time?	09:50
21	A. About three hours.	09:50
22	Q. And did you speak to anyone at Facebook	09:50
23	about your testimony today?	09:50
24	A. No. I mean, Mr. -- Mr. Chen, the counsel	09:50
25	or...	09:51

1	Q. Mr. Chen is in-house counsel at Facebook?	09:51
2	A. Yes. I think so.	09:51
3	Q. And did you review any documents to prepare	09:51
4	for your testimony today?	09:51
5	A. Yes.	09:51
6	Q. And what documents? Can you generally	09:51
7	describe the documents that you reviewed?	09:51
8	A. They appeared to be emails and an Excel	09:51
9	spreadsheet.	09:51
10	Q. And any other types of documents that you	09:51
11	reviewed?	09:51
12	A. Not that I recall.	09:51
13	Q. And how many documents would you say in	09:51
14	total did you review?	09:51
15	A. About maybe four or five.	09:51
16	Q. And were those documents selected by	09:51
17	counsel?	09:51
18	A. Yes.	09:51
19	Q. And did they refresh your recollection as to	09:51
20	any events during the time period that we're	09:52
21	covering today?	09:52
22	A. Sorry, can you -- sorry, in what sense?	09:52
23	Q. Did it remind you of events or occurrences	09:52
24	or whether you saw things you remembered from your	09:52
25	experience with them?	09:52

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1	A. Well, I saw the emails, but some of them I	09:52
2	don't really recall too well since it was -- it was	09:52
3	a little far back for me.	09:52
4	Q. And were these all emails that were -- where	09:52
5	you were the sender or the recipient?	09:52
6	A. I believe I was cc'd on them.	09:52
7	MR. LOESER: And, Counsel, we would ask that	09:52
8	you would, obviously, make sure that any material	09:52
9	that Miss Chang reviewed to prepare for this	09:52
10	deposition is produced or has been produced. Do you	09:52
11	know --	09:53
12	Counsel, do you know if those materials have	09:53
13	all been produced?	09:53
14	MR. FALCONER: Yeah, they have.	09:53
15	BY MR. LOESER:	09:53
16	Q. And Miss Chang, did you review any of the	09:53
17	pleadings or filings in this case to prepare today?	09:53
18	A. No.	09:53
19	Q. Miss Chang, what is your understanding of	09:53
20	what this case is about?	09:53
21	MR. FALCONER: And, Miss Chang, I'm going to	09:53
22	instruct you here. If the only understanding you	09:53
23	have of what the case is about is something you	09:53
24	learned in conversations with counsel, don't reveal	09:53
25	what you learned in those conversations.	09:53

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1	If you have an independent understanding	09:53
2	outside of conversations with counsel, you're free	09:53
3	to share that.	09:53
4	THE WITNESS: Well, I believe everything I	09:53
5	know is from counsel.	09:53
6	BY MR. LOESER:	09:53
7	Q. Okay. You've never read anything about this	09:53
8	case in the newspaper or online or anything like	09:53
9	that?	09:53
10	A. Not specifically, no.	09:53
11	MR. LOESER: Counsel, I will just note for	09:53
12	the record that two days ago, Tuesday, December	09:54
13	14th, at 7:09 p.m. Pacific Time, Facebook made	09:54
14	production of 1,807 documents. That production	09:54
15	included 1,204 documents for which this deponent was	09:54
16	a custodian, an additional 65 documents where this	09:54
17	deponent was identified in the metadata or its	09:54
18	directed text.	09:54
19	The produced documents from Miss Chang make	09:54
20	up over 25 percent of all the custodial documents we	09:54
21	have received for this deponent.	09:54
22	And I will just note for the record that we	09:54
23	reserve our right to recall this witness because of	09:54
24	this late production.	09:54
25	MR. FALCONER: Great. We'll reserve all	09:54

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1	rights as well.	09:54
2	BY MR. LOESER:	09:54
3	Q. Miss Chang, what is your current position at	09:54
4	Facebook?	09:54
5	A. Director of academic partnerships.	09:54
6	Q. And how long have you had that position?	09:54
7	A. Since March.	09:54
8	Q. And who do you report to in that position?	09:54
9	A. Currently or...	09:54
10	Q. Yes, currently.	09:55
11	A. Alvin Bowles.	09:55
12	Q. And what is his position?	09:55
13	A. VP of business ecosystem partnerships.	09:55
14	Q. And who reports to you currently?	09:55
15	A. Brina Collins, Christina Fan and Rachel	09:55
16	Mersey.	09:55
17	Q. And what are each of their jobs?	09:55
18	A. Product programs, research of partnerships	09:55
19	and academic programs.	09:55
20	Q. Miss Chang, what's the total amount of time	09:55
21	you've worked for Facebook?	09:55
22	A. 14 years, a little over.	09:55
23	MR. LOESER: We're going to show you what	09:55
24	will be marked Exhibit 2, which is your LinkedIn	09:55
25	resume, and we'll screen share that as well.	09:55

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1	(Exhibit 2 marked for identification.)	09:56
2	BY MR. LOESER:	09:56
3	Q. Miss Chang, I just want to quickly walk	09:56
4	through your resume. I would like to start at the	09:56
5	bottom at your initial experience at Facebook, which	09:56
6	is user operations and the time period is April 2007	09:56
7	to September 2007. Is that accurate?	09:56
8	A. Yes.	09:56
9	Q. And what is it that you did in user	09:56
10	operations during that timeframe?	09:56
11	A. I answered user tickets which were emailed	09:56
12	questions.	09:56
13	Q. So questions from Facebook users?	09:56
14	A. Correct.	09:56
15	Q. And what are the kinds of questions that	09:56
16	Facebook users would ask you?	09:56
17	A. I got locked out of my account. How do I	09:56
18	use this feature?	09:56
19	Q. And were you asked any questions about user	09:56
20	privacy and concerns users had about what was	09:57
21	happening to their content and information?	09:57
22	A. I don't remember specifically.	09:57
23	Q. And after user operations, you were the	09:57
24	global accounts manager, national direct sales, and	09:57
25	that's from 2007 to 2010; is that correct?	09:57

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1	A. Yes.	09:57
2	Q. And what is it that you did in that	09:57
3	position?	09:57
4	A. I was the account manager for advertising	09:57
5	clients on the ad agency side and brands like --	09:57
6	like Nike.	09:57
7	Q. And what does it mean that you were the	09:57
8	account manager?	09:57
9	A. I would support the ad agency or brands	09:57
10	whenever they made an advertising buy to ensure that	09:57
11	their ad campaign ran as they bought it on our	09:57
12	platform.	09:57
13	Q. And were you involved in determining how	09:57
14	user content information was used in these ad	09:58
15	campaigns?	09:58
16	A. No.	09:58
17	Q. Did you have an understanding of what	09:58
18	content and information was used in ad campaigns?	09:58
19	A. Sorry, in what sense?	09:58
20	Q. How were ad campaigns operated?	09:58
21	MR. FALCONER: Objection. Form.	09:58
22	THE WITNESS: Sorry. I'm not sure. I guess	09:58
23	that's hard to answer in a -- answer. In what	09:58
24	sense? In how I supported it or --	09:58
25	/ / /	09:58

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1	BY MR. LOESER:	09:58
2	Q. Yes. Explain to me what you did -- pick a	09:58
3	client, Nike. Nike was one of your accounts that	09:58
4	you managed?	09:58
5	A. Yes.	09:58
6	Q. Okay. What did you do for Nike	09:58
7	specifically?	09:58
8	A. So I would support an account executive at	09:58
9	Facebook so that's considered a seller, and they	09:58
10	would, you know, go into an advertising agreement	09:58
11	with that client. And my team -- well, I didn't	09:59
12	have a team, but our group, account managers, would	09:59
13	come in to help support that ad buy.	09:59
14	So at that time, we would have to manually	09:59
15	schedule the advertising and run that. So we were	09:59
16	there to help answer questions to the partner --	09:59
17	sorry, the client, and just ensure that their ad	09:59
18	campaign ran on our website.	09:59
19	Q. And were you involved at all in figuring out	09:59
20	who -- what Facebook users would be exposed to that	09:59
21	ad campaign?	09:59
22	A. No. That's -- that would be outside of my	09:59
23	scope. I was focused on supporting the ad campaign.	09:59
24	Q. Okay. So who would be involved in figuring	09:59
25	out what users were exposed to the campaign? Is	09:59

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```
 1    that how it would work, someone would advertise on      10:00

 2    the platform, that ad would not go to everybody on       10:00

 3    the platform, would it?                                  10:00

 4        A.   I'm not sure about the technical mechanics.     10:00

 5    I would imagine the product team would know.             10:00

 6        Q.   And was being a global accounts manager a       10:00

 7    promotion from user operations?                          10:00

 8        A.   It was a lateral movement.                      10:00

 9        Q.   And then from 2010 to 2014, you were the        10:00

10    strategic partner manager, social commerce and           10:00

11    developer platform.  Tell me what you did there.         10:00

12        A.   At that time, I would work with partners        10:00

13    like a Levi's, where when we released like a social      10:00

14    plugin like the "Like" button, work with them to         10:00

15    integrate that plugin into their website.                10:00

16        Q.   And was that position a promotion from          10:01

17    global accounts manager or a lateral?                    10:01

18        A.   Lateral.                                         10:01

19        Q.   And how many different partners did you work    10:01

20    with in your capacity as the manager?                    10:01

21        A.   I don't remember the specific number.           10:01

22        Q.   Was it like hundreds, or a few, or what's       10:01

23    your recollection?                                       10:01

24        A.   Sorry.  Over -- over what period of time?       10:01

25        Q.   [Audio distortion] 2007 to...                   10:01
```

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1	A. Sorry. 2010 to 2014 or...	10:01
2	Q. I'm sorry. 2010 to 2014, yeah.	10:01
3	A. I -- again, I don't remember the numbers	10:01
4	specifically, but could be in there, in maybe around	10:01
5	a hundred, I guess, over time. But not all managed	10:01
6	at once or anything.	10:02
7	Q. And, Miss Chang, what is social commerce and	10:02
8	developer platform?	10:02
9	A. Sorry. Can you -- can you repeat that?	10:02
10	Q. Yeah. I'm looking at your job title. It	10:02
11	includes the words "social commerce and developer	10:02
12	platform." Can you tell me what that is?	10:02
13	A. So the developer platform was something we	10:02
14	launched in 2007 which -- which provided APIs and	10:02
15	social plugins. And my group was focused on serving	10:02
16	the commerce vertical, meaning, for example, like a	10:02
17	Levi's or a Walmart, if they choose to integrate	10:02
18	those plugins for -- you know, to serve their	10:02
19	commerce vertical, we would work with them there.	10:02
20	Q. And can you please define what a "commerce	10:03
21	vertical" is?	10:03
22	A. Sure. It's brands engaging in online	10:03
23	commerce like a Walmart or Levi's, for example.	10:03
24	Q. And are there other types of verticals other	10:03
25	than commerce verticals?	10:03

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1	A. That I managed directly or --	10:03
2	Q. No, that just exist at Facebook.	10:03
3	A. Yes. There could be gaming, for example.	10:03
4	Q. And as best as you recall, can you just	10:03
5	describe for me the different verticals at Facebook	10:03
6	presently.	10:03
7	A. So presently, it's a bit different.	10:03
8	Q. Okay.	10:03
9	A. Yeah.	
10	Q. At this time, how many different verticals	10:04
11	were there in 2010 to 2014?	10:04
12	A. So I don't remember the specific number, but	10:04
13	an example is like gaming, social media, I guess.	10:04
14	Sorry, I can't -- I can't remember all of them.	10:04
15	Q. Can you remember, what did you view as the	10:04
16	main categories of verticals at this time?	10:04
17	A. I was just mostly focused on social	10:04
18	commerce, which was the specific vertical I was	10:04
19	focused on. So I probably have less recollection	10:04
20	around other ones, but the ones that I can recall	10:04
21	right now is gaming, for example.	10:04
22	Q. Let's move to your next position, manager,	10:04
23	Internet.org and mobile inclusion partnerships, and	10:04
24	that's from 2014 to 2017; is that correct?	10:05
25	A. Correct.	10:05

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1   Q.   And was that a lateral move also?   10:05

2   A.   It was a lateral move with a promotion. 10:05

3   Q.   And what did you do in that position,   10:05

4   Miss Chang?   10:05

5   A.   My focus was to work with our Internet.org 10:05

6   product team, which was focused on launching new   10:05

7   connectivity initiatives to help connect parts of 10:05

8   the world that didn't have Internet access.   10:05

9   My group was specifically focused on content 10:05

10   so that when we enabled access, you know, we would 10:05

11   be able to bring in relevant local content.   10:05

12   Q.   And so this was not just in the   10:05

13   United States, but in other countries as well?   10:05

14   A.   Correct.   10:05

15   Q.   So you were involved in content in other 10:06

16   countries that was published on the Facebook   10:06

17   platform?   10:06

18   A.   No, I wouldn't state it that way. Content 10:06

19   in the sense of websites that we would enable access 10:06

20   via the Free Basics or Internet.org service. So it 10:06

21   wasn't related to the developer platform.   10:06

22   Q.   And what are "mobile inclusion   10:06

23   partnerships"?   10:06

24   A.   Mobile inclusion partnerships consisted of 10:06

25   working with non-profits. So, for example, we would 10:06

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1	work with like the WHO, who would focus on creating	10:06
2	content that was localized to help, you know,	10:06
3	perhaps a -- perhaps a very specific region within	10:06
4	Africa to drive awareness around malaria.	10:06
5	And so we would work with groups where there	10:07
6	wasn't content available to be able to localize it	10:07
7	and help address more of, like, you know, global	10:07
8	health issues or localized issues.	10:07
9	Q. And did you work with foreign governments in	10:07
10	this role as well?	10:07
11	A. I've interacted with them, but I didn't	10:07
12	formally do business or anything with them.	10:07
13	Q. So your next position was head of business	10:07
14	platform partnerships. Was that a promotion? It	10:07
15	sounds like a promotion.	10:07
16	A. I would say it was a lateral movement with a	10:07
17	promotion.	10:07
18	Q. And that was from 2017 through September of	10:07
19	2019; is that correct?	10:07
20	A. Correct.	10:07
21	Q. And tell me what you did in that role.	10:07
22	A. Sure. Shifting from Internet.org, I moved	10:07
23	over to focus around how we can enable more local	10:08
24	and small businesses through -- through like	10:08
25	features and offerings.	10:08

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1	So, for example, you know, a local	10:08
2	restaurant, being able to help connect their --	10:08
3	their online reservation system through Open Table	10:08
4	so people can make reservations via their page.	10:08
5	Q. And did you have particular clients or were	10:08
6	you just overseeing the operation?	10:08
7	A. So I didn't work with clients because this	10:08
8	was just platform offerings, so it was more of	10:08
9	integration with APIs. This is different than	10:08
10	advertising sales, which I haven't been in for a	10:08
11	while.	10:09
12	Q. Okay. And we'll get into questions about	10:09
13	APIs.	10:09
14	But so were you helping design what APIs	10:09
15	were made available to these partners on the	10:09
16	platform?	10:09
17	A. I did not design it. I'm not on the product	10:09
18	team. I was mostly working with partners to help	10:09
19	drive adoption.	10:09
20	Q. And what did you do help drive adoption?	10:09
21	A. I would meet with, for example, Open Table	10:09
22	and help, you know, provide them context around the	10:09
23	benefits of enabling their service for small	10:09
24	businesses on the Facebook -- on the Facebook	10:09
25	platform and helping to extend their reservation	10:09

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1	systems there so that local businesses can drive	10:09
2	direct reservations on Facebook.	10:09
3	Q. And then moving to your -- the next job from	10:09
4	that is the job you currently hold; is that right,	10:09
5	director of platform product partnerships?	10:09
6	A. Correct.	10:10
7	Q. And that entry in your resume starts with	10:10
8	"Research Platform/Academic Partnerships/Developer	10:10
9	Platform & Business Platform."	10:10
10	Can you explain what all that means --	10:10
11	[Simultaneous talking]	
12	BY MR. LOESER?	
13	Q. -- the tasks that you performed as the	10:10
14	director of platform product partnerships; is that	
15	right?	10:10
16	DEPOSITION REPORTER: Excuse me. Can you	10:10
17	repeat your question, please.	10:10
18	BY MR. LOESER:	10:10
19	Q. Yes. Are -- the line in your resume that	10:10
20	starts, "Research Platform/Academic Partnerships,	10:10
21	Developer Platform & Business Platform," is that a	10:10
22	description of what it is that you are doing as the	10:10
23	director of platform product partnerships?	10:10
24	A. Correct. But I haven't updated it to my	10:10
25	most recent, which is now I'm fully focused on	10:10

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1	academic partnerships since March.	10:10
2	Q. Okay. Well, let's talk about what's in your	10:10
3	LinkedIn resume right now.	10:10
4	Can you please explain to me what it is that	10:11
5	you are doing as the director of platform product	10:11
6	partnerships before your current transition to just	10:11
7	dealing with academic partnerships?	10:11
8	A. Yes. I would work with product teams,	10:11
9	product teams that include business platform, which	10:11
10	is that, yeah, the example I gave you around Open	10:11
11	Table. I came back to support the developer	10:11
12	platform through its login service, and what that	10:11
13	meant was working with the product team to help them	10:11
14	with their go-to-market strategy so that we could	10:11
15	work with the actual partnerships' teams that were	10:11
16	in market to ensure that they had the right	10:11
17	materials to be able to connect and -- connect with	10:11
18	partners and, you know, help them to adopt these	10:11
19	products.	10:11
20	Q. What do you mean by the "right materials"?	10:11
21	A. "Right materials" meaning ensuring that they	10:12
22	had the right marketing language, meaning just	10:12
23	because you create something, if you can't talk	10:12
24	about it and market it correctly, people wouldn't be	10:12
25	able to understand it.	10:12

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1   So ensuring that partner managers who are on   10:12

2   the ground would have the right information to   10:12

3   connect with partners to help them understand what   10:12

4   the product was.   10:12

5   Q.   And this describes your role as to research 10:12

6   these different platforms. What did you do to   10:12

7   research the platforms?   10:12

8   A.   So currently, I work with the Facebook Open 10:12

9   Research and Transparency Team, where they've   10:12

10   developed researcher APIs so that we can now enable   10:12

11   privacy preserved measures to allow researchers to   10:12

12   use that data for their studies.   10:12

13   Q.   And what are -- explain to me what   10:13

14   privacy -- what was the description, of the   10:13

15   measures? Privacy what?   10:13

16   A.   Privacy preserving measures. So I'm not the 10:13

17   technical or product owner, so I'll specify that.   10:13

18   But high level, you know, in ensuring that, you   10:13

19   know, information is going through a virtual clean   10:13

20   room, differential privacy applied. I am not an   10:13

21   expert in this, so I don't know the details of how   10:13

22   it all works.   10:13

23   Q.   And is this a new task or is this something 10:13

24   that someone else did before you did it?   10:13

25   A.   I'm not sure I understand.   10:13

1	Q. This privacy preserving structure, is that	10:13
2	something new, or is that something that previously	10:13
3	existed?	10:13
4	A. So that was created by the product team.	10:13
5	What my team focused on is working with researchers	10:13
6	to drive adoption for that product. So I can't	10:14
7	speak to that -- the specifics of the history of	10:14
8	that product.	10:14
9	Q. And how do researchers drive adoption of the	10:14
10	product?	10:14
11	A. They're able to go through the Facebook Open	10:14
12	Research and Transparency, or FORT, environment and,	10:14
13	you know, they can apply for access. And we work	10:14
14	with researchers when they apply for access and help	10:14
15	get them set up so they can access those APIs -- or	10:14
16	sorry, not APIs, datasets.	10:14
17	Q. Miss Chang, when did you transition to your	10:14
18	current role?	10:14
19	A. March --	10:14
20	Q. I'm sorry. Go ahead.	10:14
21	A. March 2021.	10:14
22	Q. Okay. And so did someone take over the task	10:14
23	that you previously were responsible for?	10:14
24	A. Yes. It transferred over to another team.	10:15
25	Q. And what team was that?	10:15

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1	A. The -- the acronym is PPM, but I'm trying to	10:15
2	recall what the "PPM" stands for. Product partner	10:15
3	marketing.	10:15
4	Q. And who runs that team?	10:15
5	A. Kelly Stonelake.	10:15
6	Q. Have you worked with -- is Kelly a man or a	10:15
7	woman?	10:15
8	A. I believe she -- she's a she.	10:15
9	Q. And had you worked with her before as the	10:15
10	director of platform product partnerships?	10:15
11	A. Yes.	10:15
12	Q. Are there any other jobs or roles that you	10:15
13	performed at Facebook that are not covered by the	10:15
14	resume that we just went through?	10:16
15	A. In what sense? Do you mean like -- sorry.	10:16
16	Q. Did you have any other positions other than	10:16
17	the ones that are listed there?	10:16
18	A. No.	10:16
19	Q. During the time that you have worked for	10:16
20	Facebook, what software systems have you used to	10:16
21	communicate with your colleagues?	10:16
22	A. Sorry. I don't understand.	10:16
23	Q. How did you communicate with your colleagues	10:16
24	over the past 14 years at Facebook?	10:16
25	A. Well, I think it depends on what year it	10:16

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1	was. When I first started, you know, we would	10:16
2	have -- we would use Facebook Chat, and then we	10:16
3	would -- we evolved to Workplace Chat, and then	10:16
4	email.	10:16
5	Q. Okay. So you have described three different	10:16
6	things. Are there any other -- I'm calling them	10:17
7	"systems," you might call them something else.	10:17
8	Are there any other systems that you used to	10:17
9	communicate with your colleagues?	10:17
10	A. Not that I recall.	10:17
11	Q. For example, did you use Slack?	10:17
12	A. No. Well, I haven't used Slack, but I can't	10:17
13	speak for others.	10:17
14	Q. WIP, do you use WIP?	10:17
15	A. Yes. But I don't think that's a	10:17
16	communication tool. More of a document tool.	10:17
17	Q. Okay. Let's expand -- have we covered all	10:17
18	the different communication tools that you've used	10:17
19	over the last 14 years?	10:17
20	A. To my understanding. I don't know if you	10:17
21	would classify other types but, yes, email and work	10:17
22	chat.	10:17
23	Q. I assume you talk to your employees; right,	10:17
24	to your --	10:17
25	A. Oh, yes. I guess, yeah, verbal.	10:17

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1	Q. And did you chat with them using your phone?	10:18
2	A. Through apps like Workplace.	10:18
3	Q. But not just using -- what kind of phone	10:18
4	have you had over the last 14 years? Is it an	10:18
5	iPhone?	10:18
6	A. An Apple iPhone.	10:18
7	Q. And did you use the chat feature on your	10:18
8	iPhone to communicate with others?	10:18
9	A. Sorry, which chat feature?	10:18
10	Q. On your iPhone -- is there a chat feature on	10:18
11	your iPhone?	10:18
12	A. I've used -- I've used the Workplace Chat	10:18
13	application.	10:18
14	Q. How about texting? Did you text on your	10:18
15	iPhone with your colleagues regarding work?	10:18
16	A. No.	10:18
17	Q. You never texted your colleagues with your	10:18
18	iPhone?	10:18
19	MR. FALCONER: Objection. Asked and	10:18
20	answered.	10:18
21	BY MR. LOESER:	10:18
22	Q. I'm sorry. You did not text your colleagues	10:18
23	for work-related matters on your iPhone --	10:18
24	A. Oh, for work, no.	10:19
25	Q. Did you ever utilize a personal email	10:19

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1	account for work-related communications?	10:19
2	A. No.	10:19
3	Q. Did you ever send anything from your work	10:19
4	account to your home account to save it for any	10:19
5	particular reason?	10:19
6	A. I mean, I believe I've accidentally sent	10:19
7	something to my personal email just because it may	10:19
8	have auto-populated, but not intentionally.	10:19
9	Q. Okay. So you never thought this is worth	10:19
10	saving or this is important, I'm going to send it to	10:19
11	my home address?	10:19
12	A. No.	10:19
13	Q. Now, we went over your whole time and work	10:19
14	for Facebook. And it sounds like you have done some	10:19
15	work directly involving users; is that right?	10:19
16	That's where you started?	10:19
17	A. Yes, interacting with users in user	10:19
18	operation.	10:19
19	Q. And you also had a position where you	10:19
20	interacted with advertisers; is that right?	10:19
21	A. Correct. Working with advertisers in the	10:19
22	global national sales.	10:20
23	Q. And you also had positions where you	10:20
24	interacted with partners; is that right?	10:20
25	A. Correct.	10:20

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```
 1        Q.    Now, is there any other category of entities  10:20

 2   that utilize Facebook that you interacted with other  10:20

 3   than those?  Does that cover everything, or are      10:20

 4   there other types of Facebook partners or actors?    10:20

 5   Do you understand what I'm asking?                   10:20

 6        A.    Can you give an example?                  10:20

 7        Q.    You've interacted with users, you've      10:20

 8   interacted with advertisers, you've interacted with  10:20

 9   partners.                                            10:20

10           Is there any other category you've           10:20

11   interacted with or does that cover everything?       10:20

12        A.    I think so.                               10:20

13        Q.    You think that covers everything?         10:20

14        A.    Well, I don't know how you -- sorry, I'm  10:20

15   trying to understand the full definition.  But to my 10:20

16   knowledge, yes.  Yeah.                               10:20

17        Q.    And you clearly have a lot of experience  10:20

18   with working with partners; is that right?           10:20

19        A.    Correct.                                  10:20

20        Q.    Have you been involved in helping form any 10:21

21   policies or procedures at Facebook?                  10:21

22        A.    In what sense?                            10:21

23        Q.    In any of the different types of users,   10:21

24   advertisers, partners, were you involved in helping  10:21

25   create policy for any of those groups?               10:21
```

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1	A. No.	10:21
2	Q. Do you have particular things that you would	10:21
3	consider major accomplishments for yourself at	10:21
4	Facebook?	10:21
5	A. I would say the time here in itself and, you	10:21
6	know, working with -- you know, working with	10:21
7	partners on new innovative things, you know, such as	10:21
8	the "Like" button with Levi's, that was the first of	10:21
9	its kind. Working with Ticketmaster, you know,	10:22
10	first of its kind in terms of being able to sell	10:22
11	tickets. Working on Internet.org, enabling, you	10:22
12	know, new access in different regions of the world.	10:22
13	And then now working with researchers trying to	10:22
14	enable that -- that area too.	10:22
15	Q. And do you feel like you have been able to	10:22
16	influence how Facebook does business with its	10:22
17	partners?	10:22
18	A. In what sense?	10:22
19	Q. In the sense of evolving or changing their	10:22
20	practices or innovating their practices.	10:22
21	A. I guess it's a little broad, but in the	10:22
22	sense that I'm able to help the partners achieve the	10:22
23	goals where it makes sense, yes.	10:22
24	Q. How is the term "partner" used by Facebook?	10:22
25	A. Partner is someone that Facebook is working	10:23

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1	with. It doesn't necessarily mean that there's a	10:23
2	monetary exchange, but someone that we would	10:23
3	collaborate with for a larger goal or objective.	10:23
4	Q. And sometimes there's a monetary exchange	10:23
5	with partners?	10:23
6	A. Advertisers, for example, would be a	10:23
7	partner.	10:23
8	Q. Are there other types of partners for which	10:23
9	there is a monetary exchange?	10:23
10	A. I don't know in full depth. It's possible.	10:23
11	Q. What do you mean by "monetary exchange"?	10:23
12	A. I guess that's what I meant by I don't know	10:23
13	fully. So my understanding in terms of advertising,	10:23
14	like if you buy advertising, in that sense.	10:23
15	Q. So people spending money -- paying Facebook	10:23
16	money; right? Is that what advertisers do?	10:23
17	A. Yeah. Not people, but advertisers.	10:24
18	Q. Okay. And are there partners where Facebook	10:24
19	pays the partners money?	10:24
20	A. I imagine there is, but I don't work on that	10:24
21	directly.	10:24
22	Q. But can you identify any of those types of	10:24
23	partners?	10:24
24	A. No, I don't know specifically.	10:24
25	Q. What are the different types of partners	10:24

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1	that you're aware of?	10:24
2	A. I would say the ones you've listed,	10:24
3	advertisers -- advertisers, developers, anyone that	10:24
4	we worked with in that sense.	10:24
5	Q. So you mentioned Nike, for example, and --	10:24
6	A. Yeah.	10:24
7	Q. What type of partner is Nike?	10:24
8	A. I guess we don't have like special labels.	10:25
9	They -- they're just a partner that we would work	10:25
10	with, someone who's used our products in different	10:25
11	ways; for example, they've used our advertising	10:25
12	product. They've used APIs. So in that sense,	10:25
13	they're a partner.	10:25
14	Q. So partners can be advertisers; right?	10:25
15	A. Yes, correct.	10:25
16	Q. And can you think of -- you mentioned	10:25
17	Levi's, for example. That's something -- you put	10:25
18	that in the same kind of general category as Nike.	10:25
19	And is that category that they're an	10:25
20	advertiser or they're some other type of partner?	10:25
21	A. So, again, I think it depends on who's	10:25
22	working with them. But in my experience working	10:25
23	with them, I worked with them in the capacity as an	10:25
24	advertiser when I was in national sales, you know,	10:25
25	between that time.	10:25

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1	And then I also worked with them when I	10:26
2	moved over to developer platform when they	10:26
3	integrated the Like button plugin.	10:26
4	Q. So when you're working with a company like	10:26
5	Levi's as an advertiser, is the -- is Levi's able to	10:26
6	access user content information through Facebook	10:26
7	APIs?	10:26
8	A. I don't -- I'm not sure I understand.	10:26
9	Q. Well, in your relationship with Levi's, was	10:26
10	Levi's able to access Facebook APIs and obtain user	10:26
11	content information?	10:26
12	A. I don't know -- sorry.	10:26
13	MR. FALCONER: Objection. Form.	10:26
14	THE WITNESS: Sorry.	
15	MR. FALCONER: I -- objection. Form.	10:26
16	Go ahead.	10:26
17	BY MR. LOESER:	
18	Q. Do you have --	
19	A. I don't know.	10:26
20	Q. Yeah. And I mentioned Levi's only because	10:26
21	you mentioned it.	10:26
22	So when you have a partnership arrangement	10:26
23	with Levi's, is there something that Levi's is	10:26
24	getting from Facebook?	10:26
25	A. So I don't -- oh --	10:26

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1	MR. FALCONER: Sorry. Objection. Form.	10:26
2	Go ahead.	10:27
3	THE WITNESS: So I don't know. When I	10:27
4	worked with them on the Like button, they -- they	10:27
5	implemented a plugin, so I don't -- I can't speak	10:27
6	for them holistically because I only worked with	10:27
7	them at that moment in time.	10:27
8	BY MR. LOESER:	10:27
9	Q. You worked with various partners	10:27
10	specifically having to do with the API commissions	10:27
11	that they had; is that right?	10:27
12	A. Sorry. It's a little generalized. What do	10:27
13	you mean?	10:27
14	Q. Well, again, did Levi's have any access to	10:27
15	any Facebook APIs that you're aware of?	10:27
16	A. So at that time I worked with them, I worked	10:27
17	specifically on the plugin, the Like button plugin.	10:27
18	Q. How about Nike? Did Nike have any access to	10:27
19	any Facebook APIs?	10:27
20	A. To my knowledge, when I worked with them,	10:27
21	they had access to a publishing API so that when a	10:27
22	person went on a run, via their Nike fuel band, they	10:28
23	were able to publish that story onto Facebook if	10:28
24	they opted into that.	10:28
25	Q. Okay. So Nike, as a partner, was able to	10:28

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1	access particular APIs for which they had	10:28
2	permission; right?	10:28
3	A. Yes.	10:28
4	Q. And Nike, like Levi's, was considered an	10:28
5	advertiser; is that right?	10:28
6	MR. FALCONER: Objection. Form.	10:28
7	Go ahead.	10:28
8	THE WITNESS: Oh, yes, they were	10:28
9	advertisers, but I don't know if it always	10:28
10	overlapped perfectly, but...	10:28
11	BY MR. LOESER:	10:28
12	Q. Are app developers considered partners?	10:28
13	A. Yes, if -- yes.	10:28
14	Q. And do you know what "data brokers" are?	10:28
15	A. Like generally or...	10:28
16	Q. Yes, generally.	10:29
17	A. Yes.	10:29
18	Q. What are data brokers?	10:29
19	A. They are an entity that may facilitate the	10:29
20	trade of data.	10:29
21	Q. Okay. And they're considered partners as	10:29
22	well at Facebook?	10:29
23	A. I don't know. I don't work with data	10:29
24	brokers.	10:29
25	Q. Do you know -- you mentioned the monetary	10:29

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1	exchange aspect. Do you know if there was a	10:29
2	monetary exchange between Facebook and data brokers?	10:29
3	A. I don't know.	10:29
4	Q. Are advertisers sometimes also app	10:29
5	developers?	10:29
6	A. Yes.	10:29
7	Q. Miss Chang, why does Facebook have partners?	10:29
8	A. I think that depends in terms of -- so	10:29
9	Facebook is hard to generalize as one entity. It's	10:30
10	made up of, you know, different groups trying to	10:30
11	drive different goals. And I would say related to	10:30
12	different goals, they may partner to help achieve	10:30
13	that goal. So I can't speak to what every	10:30
14	individual team's goals are.	10:30
15	Q. So let's just think in terms of the partners	10:30
16	with which you've been involved.	10:30
17	A. Okay.	10:30
18	Q. Why does Facebook have those partnerships?	10:30
19	DEPOSITION REPORTER: Excuse me. I lost the	10:30
20	last word. "Why does Facebook..."	10:30
21	BY MR. LOESER:	10:30
22	Q. -- have those partnerships?	10:30
23	A. So, for example, when I worked with Levi's	10:30
24	on the Like button, you know, there was an -- at the	10:30
25	time, we wanted to be able to show how expression	10:30

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1	outside of Facebook could be possible because at	10:31
2	that time, you know, all interactions were contained	10:31
3	within a website, meaning like if you liked	10:31
4	something, it would only be within Facebook. And so	10:31
5	something innovative like the Like plugin at the	10:31
6	time was to help connect, you know, websites out of	10:31
7	Facebook to be able to interact and be represented	10:31
8	on Facebook.	10:31
9	And so for that specific example, you know,	10:31
10	the goal was to be able to show that -- show that	10:31
11	value through an integration where people can	10:31
12	experience that.	10:31
13	Q. And wasn't another purpose for Facebook to	10:31
14	collect information about the user for its own use?	10:31
15	A. I don't know. That would be a bit outside	10:31
16	of my -- my specific role.	10:31
17	Q. Facebook shared user content information	10:32
18	with partners; is that right?	10:32
19	A. In what sense?	10:32
20	Q. Well, I'm asking you, in your role involved	10:32
21	in all the capacities dealing with partners, was	10:32
22	there a sharing of user content information --	10:32
23	MR. FALCONER: Objection. Form.	10:32
24	THE WITNESS: So we would have public APIs,	10:32
25	where if people consented, you know, I believe they	10:32

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1	would be able to provide that data to the	10:32
2	application developer.	10:32
3	BY MR. LOESER:	10:32
4	Q. Okay. And so through the API, a partner	10:32
5	could obtain user content information about users;	10:32
6	is that right?	10:32
7	MR. FALCONER: Objection. Form.	10:32
8	THE WITNESS: I think that depends. I	10:32
9	wouldn't generalize it to that because it would be	10:32
10	dependent on what the developer created and what	10:33
11	they were approved to use.	10:33
12	BY MR. LOESER:	10:33
13	Q. Okay. But there were partners that were	10:33
14	approved to have access to various API permissions;	10:33
15	is that right?	10:33
16	MR. FALCONER: Objection. Form.	10:33
17	THE WITNESS: I imagine so.	10:33
18	BY MR. LOESER:	10:33
19	Q. And don't you, in fact, know so from your --	10:33
20	from the work you did with partners?	10:33
21	MR. FALCONER: Objection. Form and asked	10:33
22	and answered.	10:33
23	THE WITNESS: So for specific partners for	10:33
24	specific permissions, yes, but I thought you were	10:33
25	trying to speak to it more generally, which I didn't	10:33

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1	manage generally. There was an operations team for	10:33
2	that.	10:33
3	BY MR. LOESER:	10:33
4	Q. And when Facebook shares -- when Facebook	10:33
5	shares user information with a third party, what	10:33
6	does that mean to you?	10:33
7	A. I think it depends on what specific -- what	10:33
8	specific group. So in the context of my experience	10:34
9	on the developer platform, it would be through the	10:34
10	developer APIs and the permissions there.	10:34
11	Q. Okay. And I just want to make sure I	10:34
12	understand how you use the terminology.	10:34
13	Through the APIs -- APIs are a way for a	10:34
14	third party that has permission to obtain various	10:34
15	categories of information that Facebook has	10:34
16	collected about the user; is that right?	10:34
17	MR. FALCONER: Objection. Form.	10:34
18	Go ahead.	10:34
19	THE WITNESS: Sorry. Can you restate that?	10:34
20	MR. LOESER: Why don't we just repeat the	10:34
21	question. Would you read the question back, please,	10:34
22	Miss Jennings.	10:34
23	(Record read as follows:	10:34
24	"Q. Okay. And I just want to make sure	10:34
25	I understand how you use the terminology.	10:34

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1	Through the APIs -- APIs are a way for a	10:34
2	third party that has permission to obtain	10:34
3	various categories of information that	10:34
4	Facebook has collected about the user;	10:34
5	is that right?")	
6	THE WITNESS: No.	10:35
7	MR. FALCONER: Same objection.	10:35
8	BY MR. LOESER:	10:35
9	Q. So APIs are a way for a third party to	10:35
10	obtain various categories of information that	10:35
11	Facebook has collected about a user; correct?	10:35
12	A. Yes. It's a -- it's a vehicle, but I	10:35
13	wouldn't necessarily say -- again, I'm not a	10:35
14	technical person. I don't know if that's all	10:35
15	technically how it's done, but to my understanding,	10:35
16	it sounds right.	10:35
17	Q. Are you familiar with the concept at	10:35
18	Facebook of reciprocity?	10:35
19	A. Yes.	10:35
20	MR. FALCONER: Objection. Form.	10:35
21	Go ahead.	10:35
22	BY MR. LOESER:	10:35
23	Q. Can you explain to me how Facebook uses the	10:35
24	term reciprocity with -- particularly with respect	10:35
25	to partners?	10:36

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1	MR. FALCONER: Same objection.	10:36
2	THE WITNESS: My understanding of	10:36
3	reciprocity is a value exchange.	10:36
4	BY MR. LOESER:	10:36
5	Q. And explain what you mean by that.	10:36
6	A. "Value" meaning -- and it doesn't	10:36
7	necessarily mean monetary. So, you know, going back	10:36
8	to partnerships, ensuring that if we're going to	10:36
9	partnerships, there's value in that experience.	10:36
10	So, for example, in working with Levi's, the	10:36
11	value they provided in integrating with the Like	10:36
12	plugin is being able to allow users to interact with	10:36
13	the website and be able to publish stories around	10:36
14	things they like back to Facebook.	10:36
15	Q. So is value another way of saying	10:36
16	information? So when there's value -- when there is	10:36
17	reciprocity with a partner, that means that Facebook	10:36
18	is giving that partner some information about users,	10:36
19	and Facebook is obtaining from that partner some	10:37
20	information about users; is that right?	10:37
21	A. Not to my understanding.	10:37
22	Q. It's not your understanding that in exchange	10:37
23	for providing information, Facebook gets back	10:37
24	information?	10:37
25	A. Well, I think it's dependent. So when I was	10:37

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1	talking about the value exchange, it doesn't have to	10:37
2	be information. Value can be in the sense of like	10:37
3	experience. So if the experience is making the user	10:37
4	experience better, meaning it brings like delight to	10:37
5	a user, then that's also an exchange in value.	10:37
6	Q. However, it is sometimes an exchange of	10:37
7	information; is that correct?	10:37
8	A. Yes. It could be.	10:37
9	Q. Give me an example of what an exchange of	10:37
10	information would be, for example, with Amazon.	10:37
11	What would an exchange of information be?	10:37
12	A. So for example, with the Kindle integration,	10:37
13	an exchange would be the ability for people to	10:37
14	publish back to Facebook things they've highlighted.	10:37
15	So if they are asking for, you know, permissions	10:38
16	from the user to make that more -- the experience	10:38
17	more personalized, you know, our hope is that it's	10:38
18	not purely just to extract information, but also to	10:38
19	publish back, so allowing users who choose to	10:38
20	publish, you know, their experience back to	10:38
21	Facebook.	10:38
22	Q. Okay. And what does Facebook do with the	10:38
23	information that's published back?	10:38
24	A. I don't know.	10:38
25	Q. Do you know anything about how it studies --	10:38

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1	Facebook studies that information or analyzes it?	10:38
2	A. No. That would be outside my scope.	10:38
3	Q. Do you know if, in fact, information that is	10:38
4	published back is studied and analyzed by Facebook?	10:38
5	A. I don't know.	10:38
6	Q. You don't know if that happens, or you just	10:38
7	don't know anything about it?	10:38
8	A. I just don't know. It is outside my scope	10:38
9	so I can't really speak to it.	10:38
10	Q. And Miss Chang, you worked with partners	10:38
11	with whom there was reciprocity; is that right?	10:39
12	A. In what sense?	10:39
13	MR. FALCONER: Objection to form.	10:39
14	BY MR. LOESER:	10:39
15	Q. In the sense that we have just been	10:39
16	discussing, information was published back to you --	10:39
17	published back to Facebook after Facebook provided	10:39
18	information to the partner.	10:39
19	A. Yes. So if Kindle is an example, we worked	10:39
20	with partners in that sense, but I wouldn't say	10:39
21	reciprocity is like -- it's not a product.	10:39
22	Q. Right.	10:39
23	A. It's more of a concept.	10:39
24	Q. It's an important concept to Facebook;	10:39
25	right?	10:39

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1	A. I don't know.	10:39
2	Q. Were you involved in making sure that there	10:39
3	was reciprocity with partners with whom you worked?	10:39
4	A. I don't know in the sense that I -- I'm not	10:39
5	sure I understand.	10:39
6	Q. Well, did you ever, for example, communicate	10:39
7	to your colleagues that some interaction with a	10:39
8	partner was positive because there was progress with	10:40
9	reciprocity?	10:40
10	A. I'm not sure I understand. So when I would	10:40
11	work with a partner, I would try to ensure that I'm	10:40
12	always representing the voice of a partner	10:40
13	holistically, meaning the different ways that we're	10:40
14	working with them, the things that would impact	10:40
15	their business. Not necessarily in the scope of	10:40
16	reciprocity.	10:40
17	Q. But you would also want to make sure that if	10:40
18	Facebook was giving content information to the	10:40
19	partner, that Facebook was getting back some	10:40
20	information; isn't that correct?	10:40
21	A. I didn't regulate that. Well, I guess I'm	10:40
22	having a hard time understanding. Like I don't	10:40
23	regulate that.	10:40
24	Q. You don't recall any examples of where you	10:40
25	were endeavoring to encourage reciprocity?	10:41

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1	A. I'm not sure I understand.	10:41
2	Q. Miss Chang, are some partners considered	10:41
3	more valuable to Facebook than other partners?	10:41
4	A. I guess in the -- I guess it depends on what	10:41
5	specific initiative or project. I wouldn't say it's	10:41
6	one holistic stack rank.	10:41
7	Q. Okay. Can you think of any -- any	10:41
8	characteristics of a partner that would make it more	10:41
9	valuable to Facebook than other partners?	10:41
10	A. So, again, I think it depends. So in the	10:41
11	capacity where I've worked with them so, for	10:41
12	example, we used the Like button, in that specific	10:41
13	experience like, you know, to us it was valuable	10:41
14	working with Levi's in order to be able to exemplify	10:41
15	like the product that we were trying to build and	10:42
16	ship. So in that context, they were valuable to us,	10:42
17	but I can't speak to just every other --	10:42
18	partnerships in every other capacity.	10:42
19	Q. So is a partner that publishes back a lot of	10:42
20	content information considered a valuable partner	10:42
21	for Facebook?	10:42
22	MR. FALCONER: Objection. Form.	10:42
23	BY MR. LOESER:	
24	Q. Taking into account on determining whether	10:42
25	that was a valuable partner?	10:42

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1	MR. FALCONER: Same objection.	10:42
2	THE WITNESS: Again, I don't know. And I	10:42
3	guess it's kind of hard to generalize it, so I don't	10:42
4	know.	10:42
5	BY MR. LOESER:	10:42
6	Q. So is the value of a partner based on how	10:42
7	much user content information Facebook obtains from	10:42
8	a partner?	10:42
9	MR. FALCONER: Objection. Form. And asked	10:42
10	and answered.	10:42
11	THE WITNESS: I don't know.	10:42
12	BY MR. LOESER:	10:42
13	Q. Miss Chang, are some partners considered	10:43
14	vendors?	10:43
15	A. Yes. Yeah.	10:43
16	Q. So what would a "vendor" be?	10:43
17	A. A vendor would be -- sorry. A vendor would	10:43
18	be someone we buy services from.	10:43
19	Q. Okay. And can you think of any examples of	10:43
20	services that Facebook buys?	10:43
21	A. Yes. Like a Salesforce; they could be an	10:43
22	advertiser and we could use their enterprise	10:43
23	software.	10:43
24	Q. So they would provide a service? That	10:43
25	particular type of partner would provide a service	10:43

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1	to Facebook?	10:43
2	A. That partner in the advertising capacity	10:43
3	could also be a vendor.	10:43
4	Q. And a lot of partner arrangements, the	10:43
5	information the partner obtains from Facebook is	10:44
6	used to support that partner's business; is that	10:44
7	right?	10:44
8	MR. FALCONER: Objection. Form.	10:44
9	THE WITNESS: Sorry. I don't understand.	10:44
10	Can you -- can you say it another way or...	10:44
11	BY MR. LOESER:	10:44
12	Q. What is your understanding of what a partner	10:44
13	does when it obtains user content information from	10:44
14	Facebook?	10:44
15	MR. FALCONER: Objection. Form.	10:44
16	THE WITNESS: I don't know. If there's	10:44
17	something more specific...	10:44
18	BY MR. LOESER:	10:44
19	Q. Do you know anything about how Facebook uses	10:44
20	user content information in its advertising	10:44
21	business?	10:44
22	A. No, not technically.	10:44
23	Q. Do you know anything about how Facebook	10:44
24	monetizes information that it obtains from its	10:45
25	partners?	10:45

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1	MR. FALCONER: Objection. Form.	10:45
2	Go ahead.	10:45
3	THE WITNESS: Not specifically.	10:45
4	BY MR. LOESER:	10:45
5	Q. Well, generally, do you know?	10:45
6	A. No. I don't -- well, I don't know in the	10:45
7	capacity that -- sorry, if you can give me an	10:45
8	example.	10:45
9	Q. Was that something that you ever discussed	10:45
10	with your colleagues, how Facebook monetizes	10:45
11	information?	10:45
12	A. No, not that I -- that I recall.	10:45
13	Q. Do you know what group at Facebook managed	10:45
14	the relationship with data brokers?	10:45
15	A. No.	10:45
16	Q. Do you know if data brokers were ever app	10:45
17	developers for Facebook?	10:46
18	A. I don't know.	10:46
19	Q. Do you know if data brokers were ever	10:46
20	advertisers for Facebook?	10:46
21	A. I don't know.	10:46
22	MR. LOESER: I will show you what we will	10:46
23	mark as Exhibit 3. We will screen share that as	10:46
24	well.	10:46
25	(Exhibit 3 marked for identification.)	10:46

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1	BY MR. LOESER:	10:46
2	Q. This is an email from -- and I'm not sure	10:46
3	I'm saying this name right. Ime Archibong. Do you	10:46
4	know who that is?	10:46
5	A. Yes, Ime Archibong.	10:46
6	Q. Ime Archibong. What is Ime Archibong's job?	10:46
7	A. At this time or...	10:46
8	Q. Yes.	10:46
9	A. I believe he was the director of platform	10:47
10	partnerships.	10:47
11	Q. Okay. So someone who had the job before	10:47
12	you?	10:47
13	A. I didn't have that job.	10:47
14	Q. So the Exhibit 3 is an email from Ime	10:47
15	Archibong to you, dated September 30th, 2013; right?	10:47
16	A. Sorry. Can you repeat that? I was also	10:47
17	reading the email.	10:47
18	Q. I'm just identifying this exhibit for the	10:47
19	record. And it is an email from Ime Archibong to	10:47
20	you dated September 30th, 2013; is that correct?	10:47
21	A. Yes, correct.	10:47
22	Q. And do you see the subject line on that	10:47
23	email?	10:47
24	A. Yes.	10:47
25	Q. And it says, "Re: Product Partnerships &	10:47

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1	BD: Bi-weekly Update"; is that right?	10:47
2	A. Yes.	10:47
3	Q. Now, is this -- this is an update regarding	10:47
4	a variety of actions. Are you familiar with these	10:48
5	updates? Was this something that was regularly	10:48
6	circulated?	10:48
7	A. May I -- may I read this first?	10:48
8	Q. [Inaudible]	
9	A. Okay. Sorry.	10:48
10	Q. Down the email string, this is -- you	10:48
11	provided Ime with what you describe as an "updated	10:48
12	structure for goals and progress." Do you see that?	10:48
13	A. Correct.	10:48
14	Q. And is this something that you regularly did	10:48
15	updating progress on a variety of goals, partnership	10:48
16	goals?	10:49
17	A. Yes.	10:49
18	Q. And you provided a progress report with	10:49
19	that?	10:49
20	A. Yes.	10:49
21	Q. Okay. Can you look at the first entry in	10:49
22	your updates. It says, "Updated H2'13 Product	10:49
23	Partnerships Goals/Progress: *Entities."	10:49
24	What does "H2'13" mean?	10:49
25	A. Second half 2013.	10:49

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1	Q. Okay. And what's the first entry? If you	10:49
2	could just read the first entry under that update.	10:49
3	A. "Entities."	10:49
4	Q. Yeah. Under "Entities," what does that say?	10:49
5	A. "Data Deals."	10:49
6	Q. Can you read the rest of that line?	10:49
7	A. "4 data acquisition deals."	10:49
8	Q. Okay. What is that referring to?	10:49
9	A. That's referring to data deals to build out	10:49
10	our repository of movie titles.	10:49
11	Q. Okay. And so does that suggest that	10:49
12	Facebook was purchasing that information?	10:49
13	A. Yes.	10:50
14	Q. Okay. And then it lists the source of that	10:50
15	acquisition; is that right, CinemaSource,	10:50
16	EventSource, and Sports Data?	10:50
17	A. Yes.	10:50
18	Q. And do you know if the fourth data deal, the	10:50
19	one described there as "In Progress," occurred?	10:50
20	A. I don't remember all of them.	10:50
21	Q. Okay. And tell me what specifically was the	10:50
22	data that was acquired?	10:50
23	A. From what I recall, they were information to	10:50
24	help our page datas. So, for example, movie titles	10:50
25	to ensure that we had more robust movie titles, and	10:50

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1	also robust events -- event information. So like if	10:50
2	Ticketmaster had a concert, we would be able to get	10:51
3	more details around it so that users would be able	10:51
4	to get information about the concert.	10:51
5	Q. Okay. So that's an example of data that was	10:51
6	purchased by Facebook; is that right?	10:51
7	A. Yes.	10:51
8	Q. And can you think of other examples of data	10:51
9	that was purchased by Facebook?	10:51
10	A. I -- I only probably know more specifically	10:51
11	this.	10:51
12	Q. What about data that was sold by Facebook?	10:51
13	Were you involved at all with that?	10:51
14	A. No.	10:51
15	Q. And are you aware of any data that was sold	10:51
16	by Facebook?	10:51
17	A. Not to my knowledge, no.	10:51
18	MR. FALCONER: Derek, can we take a quick	10:52
19	break whenever you are done with this document?	10:52
20	MR. LOESER: Sure. Now is fine.	10:52
21	MR. FALCONER: All right.	10:52
22	MR. LOESER: You want 10 minutes? 15	10:52
23	minutes?	10:52
24	MR. FALCONER: Yeah.	10:52
25	THE VIDEOGRAPHER: This marks the end of	10:52

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1	media No. 1 in the deposition of Jackie Chang.	10:52
2	Going off the record. The time is 10:52.	10:52
3	(Off the record.)	10:52
4	THE VIDEOGRAPHER: This marks the beginning	11:14
5	of media No. 2 in the deposition of Jackie Chang.	11:14
6	We are back on the record. The time is 11:14.	11:14
7	BY MR. LOESER:	11:14
8	Q. Miss Chang, Facebook collects content and	11:14
9	information about its users from its partners and	11:14
10	uses that information in its advertising business;	11:14
11	is that correct?	11:14
12	MR. FALCONER: Objection. Form.	11:14
13	THE WITNESS: I can't speak to that broadly,	11:14
14	meaning I don't know the technical specifics to be	11:14
15	able to support that statement.	11:15
16	BY MR. LOESER:	11:15
17	Q. But do you know that generally to be the	11:15
18	case, Miss Chang?	11:15
19	A. No. I -- I don't really feel comfortable	11:15
20	answering because I don't know.	11:15
21	Q. Do you know how Facebook makes money?	11:15
22	A. My understanding is advertising.	11:15
23	Q. And do you know whether advertising collects	11:15
24	and uses user content and information?	11:15
25	MR. FALCONER: Objection. Form.	11:15

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1	THE WITNESS: I don't know, meaning I don't	11:15
2	understand the product mechanics around that.	11:15
3	BY MR. LOESER:	11:15
4	Q. What do you understand about the advertising	11:15
5	business at Facebook?	11:15
6	A. Not much since I haven't worked on it since	11:15
7	2010.	11:15
8	Q. Do you know what portion of Facebook's	11:15
9	revenue comes from its advertising business?	11:15
10	A. Not specifically.	11:15
11	Q. Do you have any idea at all?	11:15
12	A. I think a good portion.	11:16
13	Q. And does the advertising business utilize in	11:16
14	any way, as far as you understand it, content and	11:16
15	information that Facebook collects from its	11:16
16	partners?	11:16
17	MR. FALCONER: Objection. Form.	11:16
18	THE WITNESS: Again, I don't know enough	11:16
19	about the technical specifics to make that	11:16
20	assertion. I don't know.	11:16
21	BY MR. LOESER:	11:16
22	Q. Well, I'm not asking about the technical	11:16
23	specifics, just the general concept. Is that	11:16
24	something you understand?	11:16
25	A. I don't know.	11:16

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1	Q. Miss Chang, are people who create apps for	11:16
2	Facebook called "developers"?	11:16
3	A. Yes.	11:16
4	Q. Are there other types of developers?	11:16
5	A. I only know of app developers.	11:16
6	Q. And we mentioned APIs before, but can you	11:17
7	please just explain what "APIs" are.	11:17
8	A. Application programming interface. It's a	11:17
9	way for, you know, two -- two services to connect	11:17
10	and speak to each other.	11:17
11	Q. And how does Facebook use APIs with regard	11:17
12	to user content and information?	11:17
13	A. I'm not sure I understand the question.	11:17
14	Q. Do you understand how Facebook uses APIs at	11:17
15	all?	11:17
16	A. Well, Facebook doesn't use the APIs. The	11:17
17	developer -- so, sorry, can you be a little more	11:17
18	specific?	11:17
19	Q. Yeah. How do APIs work at Facebook on its	11:17
20	platform?	11:17
21	A. I think that depends because APIs can be	11:17
22	used in a lot of different cases. Are you speaking	11:17
23	to developer platform or?	11:18
24	Q. Yes. How are -- how do third parties access	11:18
25	user content information through APIs?	11:18

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1	A. So they can go through our developer	11:18
2	platform and go through the process of approvals and	11:18
3	submitting their app to access APIs.	11:18
4	Q. Explain that process in as much detail as	11:18
5	you can.	11:18
6	A. Unfortunately, I can't. I don't work on the	11:18
7	operations side. So generally, we prefer them to go	11:18
8	through the flow, and that flow is managed by -- on	11:18
9	the product and operation side. So I can't speak to	11:18
10	the exact process.	11:18
11	Q. Okay. You are familiar with the different	11:18
12	sorts of APIs that Facebook provides for its	11:18
13	third-party access to --	11:18
14	A. Sorry, you broke up. Can you say that	11:18
15	again?	11:18
16	Q. Have you ever looked at a list of APIs that	11:18
17	are -- that app developers can use if they have	11:19
18	permission to do so?	11:19
19	A. I have looked at developer.Facebook.com,	11:19
20	which has a list of APIs.	11:19
21	Q. Okay. And are you familiar with any of	11:19
22	those APIs?	11:19
23	A. I don't -- probably not, since it's been a	11:19
24	couple years since I've worked on that directly.	11:19
25	Q. For example, are you familiar with the	11:19

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1	friends permission APIs?	11:19
2	A. I know what the name is, but I don't know	11:19
3	like the specifics around it.	11:19
4	Q. What do you know about it?	11:19
5	A. I've heard of it, like I've seen the name	11:19
6	like in emails, but I don't remember what it exactly	11:19
7	does and the technical specifics of it.	11:19
8	Q. Do you know what information the friends API	11:19
9	permissions allow a third party to access?	11:20
10	A. I don't recall specifically.	11:20
11	Q. In order to have access to APIs, what does a	11:20
12	developer need to do?	11:20
13	A. So I think that depends. Are you talking	11:20
14	about just the developer platform workflow or...	11:20
15	Q. We can start there, yeah.	11:20
16	A. Sure. On developer platform, they would go	11:20
17	to developer.Facebook.com, go through the documents	11:20
18	and, generally, they would follow the workflow for	11:20
19	approval.	11:20
20	Q. And is there a team that evaluates those	11:20
21	approvals?	11:20
22	A. Yes.	11:20
23	Q. And what about partners? Do they just -- is	11:20
24	that just the only system that exists for them, too,	11:20
25	or is there something else?	11:20

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1	MR. FALCONER: Objection. Form.	11:20
2	THE WITNESS: I'm not sure I understand.	11:21
3	BY MR. LOESER:	11:21
4	Q. Do partners just go through the developer	11:21
5	platform you just described, or is there another way	11:21
6	for them to negotiate API permissions?	11:21
7	A. So --	11:21
8	MR. FALCONER: Objection. Form.	11:21
9	THE WITNESS: So they go through that	11:21
10	process.	11:21
11	BY MR. LOESER:	11:21
12	Q. So there's -- so there's no difference	11:21
13	between how partners access and make use of APIs and	11:21
14	the public, the public --	11:21
15	A. Sorry I --	11:21
16	MR. FALCONER: Objection. Form.	11:21
17	BY MR. LOESER:	11:21
18	Q. I'm just trying to understand. We will get	11:21
19	into some documents that maybe will flush this out.	11:21
20	But in terms the different ways that APIs	11:21
21	are accessed, you have described a way that	11:21
22	developers just go on a platform. And I'm asking	11:21
23	you: Is there a different way for partners that	11:21
24	interact with Facebook?	11:21
25	MR. FALCONER: Objection. Form.	11:21

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1	THE WITNESS: So I -- like I think it's a	11:21
2	little broad. So I -- I'm struggling to know	11:21
3	exactly. But, yes, they -- depending on specific	11:21
4	need, they could go through a partnership	11:22
5	organization.	11:22
6	BY MR. LOESER:	11:22
7	Q. And were you involved at all in working with	11:22
8	partners and specifically with regard to the APIs	11:22
9	that they sought permission to utilize?	11:22
10	MR. FALCONER: Objection. Form.	11:22
11	THE WITNESS: Sorry. I don't understand,	11:22
12	like going through the developer platform or...	11:22
13	BY MR. LOESER:	11:22
14	Q. No. Just in your role working with	11:22
15	partners, have you ever had occasion to discuss with	11:22
16	partners the permissions that they wanted for APIs?	11:22
17	A. Yes.	11:22
18	Q. Okay. And explain that process.	11:22
19	A. So I don't remember in detail because it's	11:22
20	been a long time. But they could email us about it,	11:22
21	and we would generally refer them to where they	11:22
22	needed to go.	11:22
23	Q. And do you know when Facebook first started	11:23
24	using APIs with its partners?	11:23
25	A. Sorry. Can you say that -- state that	11:23

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1	again?	11:23
2	Q. Do you know when Facebook first started	11:23
3	using APIs with its partners?	11:23
4	A. I'm not sure I understand that question.	11:23
5	Technically, I don't know.	11:23
6	Q. Do you know who came up with the various	11:23
7	APIs that Facebook has?	11:23
8	A. No.	11:23
9	Q. Are you familiar with the concept of Friend	11:23
10	Sharing on the Facebook platform?	11:23
11	A. I think I've heard of it, but I don't know	11:23
12	what it is.	11:23
13	Q. Are you aware that on the Facebook platform	11:23
14	for a period of time, when a friend downloaded an	11:24
15	app, that app could obtain access to that person's	11:24
16	friends via Friend Sharing APIs?	11:24
17	MR. FALCONER: Objection. Form.	11:24
18	Go ahead.	11:24
19	THE WITNESS: I don't remember.	11:24
20	BY MR. LOESER:	11:24
21	Q. You don't remember anything about that?	11:24
22	A. No.	11:24
23	Q. That's not something you were involved at	11:24
24	all in?	11:24
25	A. I don't remember.	11:24

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1	Q. That wasn't a significant part of the work	11:24
2	that you did for Facebook?	11:24
3	A. I don't understand. Sorry, I -- I worked on	11:24
4	a lot of things, so I don't know the meaning of	11:24
5	that.	11:24
6	Q. But the work that you did with regard to	11:24
7	Friend Sharing in particular does not stand out for	11:24
8	you as being particularly meaningful?	11:24
9	MR. FALCONER: Objection --	
10	THE WITNESS: I don't think I worked on	11:24
11	Friend Sharing.	11:24
12	BY MR. LOESER:	
13	Q. Do you know what sort of information is	11:24
14	generally made available through friends	11:25
15	permissions?	11:25
16	A. No, I don't.	11:25
17	Q. Are you aware of whether an app can obtain	11:25
18	information about a person's friends who did not	11:25
19	download the app?	11:25
20	MR. FALCONER: Objection. Form.	11:25
21	THE WITNESS: I don't know.	11:25
22	BY MR. LOESER:	11:25
23	Q. Do you know how many different friends	11:25
24	permissions APIs there are?	11:25
25	A. I don't know.	11:25

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1	Q. Are you familiar with the term "high-signal	11:25
2	APIs"?	11:25
3	A. No.	11:25
4	Q. Are you familiar with the read_stream	11:25
5	permissions APIs?	11:25
6	A. I've heard of it.	11:25
7	Q. Okay. What do you know about that?	11:25
8	A. I can't recall. It's been so long, I don't	11:25
9	know.	11:26
10	Q. Do you know who came up with the idea of	11:26
11	friends permissions APIs?	11:26
12	A. No, I don't.	11:26
13	Q. Do you know what purpose it served?	11:26
14	A. No.	11:26
15	Q. Do you know if it was controversial?	11:26
16	A. I don't know.	11:26
17	Q. Do you know if that was a API -- the friends	11:26
18	APIs were often misused or abused by app developers?	11:26
19	A. I don't know.	11:26
20	MR. LOESER: I will show you Exhibit -- what	11:26
21	we marked as Exhibit 4.	11:26
22	(Exhibit 4 marked for identification.)	11:26
23	BY MR. LOESER:	11:26
24	Q. We will share that as well.	11:26
25	Exhibit 4 is an email from Marie Hagman to	11:26

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1	Chris Daniels, with a cc to you, dated May 3rd,	11:27
2	2013, "Subject: Re: FQL question."	11:27
3	Do you see that, Miss Chang?	11:27
4	A. Yes. May I read it?	11:27
5	Q. Yes, of course. I'm going to ask you some	11:27
6	specific questions about different parts of the	11:27
7	email string, but -- so we will go through it, but	11:27
8	if you want to take a look at it, go ahead.	11:27
9	A. Okay.	11:27
10	Q. Miss Chang, what is "FQL"?	11:27
11	A. I believe it's something like SQL, but I	11:27
12	don't know enough of the technical -- I don't know	11:27
13	what the term means.	11:28
14	Q. Okay. And if this email was cc'd to you,	11:28
15	does that mean that you received the email?	11:28
16	A. Yes.	11:28
17	Q. As we go through a lot of these emails, if	11:28
18	you are on the email as a recipient, you don't have	11:28
19	any reason to believe you didn't receive the emails;	11:28
20	right?	11:28
21	A. Sorry. I didn't what?	11:28
22	Q. If you're on an email as a recipient -- we	11:28
23	are going to go through a number of emails -- there	11:28
24	is no reason for you to believe that you did not	11:28
25	actually receive the email; correct?	11:28

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1	A. I don't think so.	11:28
2	Q. Okay. And this particular email string has	11:28
3	to do with capabilities that Amazon wanted in its	11:28
4	relationship with Facebook; is that right?	11:28
5	A. Yes.	11:28
6	Q. Do you understand what a "capability" is?	11:28
7	A. Not in technical detail.	11:28
8	Q. What's your general understanding of what a	11:28
9	capability means in the context of a Facebook	11:28
10	partner?	11:28
11	A. It's like a permission.	11:28
12	Q. Okay. When you say a "permission," that	11:29
13	means permission to access and use an API; is that	11:29
14	right?	11:29
15	A. Again, I don't know the technical specifics.	11:29
16	Q. Can you use an API if you don't have	11:29
17	permission to use the API?	11:29
18	A. I don't know.	11:29
19	Q. You don't have any understanding of what	11:29
20	"permissions" means in connection with an API?	11:29
21	A. I don't think I understand in -- how the	11:29
22	context you're referring it to.	11:29
23	Q. Okay. Nonetheless, this email string	11:29
24	discusses the capabilities Amazon has access to; is	11:29
25	that right?	11:29

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1	A. It looks like it.	11:29
2	Q. Okay. So if you look down the first page	11:29
3	there, in an email from Marie Hagman to you, it	11:29
4	says:	11:29
5	"Thanks Jackie, will do.	11:29
6	"If it's helpful, here is a list of	11:29
7	all the capabilities Amazon currently	11:30
8	has, including the ones in addition	11:30
9	to the auto-grants."	11:30
10	Do you see that list?	11:30
11	A. Yes.	11:30
12	Q. And do those appear to be APIs that are	11:30
13	listed?	11:30
14	A. I don't know enough where I would classify	11:30
15	them that. I don't know the technical specifics to	11:30
16	make that assertion.	11:30
17	Q. Okay. So when you look at a list of	11:30
18	capabilities and, for example, one of the items is	11:30
19	"auto_granted_friends_likes via Amazon," you don't	11:30
20	have any understanding of whether that's an API?	11:30
21	A. Yeah, I don't -- I don't know.	11:30
22	Q. Go down that list and you will see a list --	11:30
23	you will see a capability that's called	11:30
24	"auto_granted_user_videos via Amazon."	11:30
25	Do you know what information is provided by	11:30

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1	that capability?	11:30
2	A. No, I don't.	11:30
3	Q. Was Amazon a client that -- or a partner	11:30
4	that you were working -- you had any involvement	11:31
5	with?	11:31
6	A. Yes, I supported them.	11:31
7	Q. And what does that mean?	11:31
8	A. I supported them with their questions and	11:31
9	inquiries at the time as a partner manager.	11:31
10	Q. And what kinds of questions and inquiries	11:31
11	did they -- did they have?	11:31
12	A. It could be from troubleshooting to requests	11:31
13	around wanting to build integrations.	11:31
14	Q. Okay. Was it also around what permissions	11:31
15	they could obtain and what capabilities they wanted	11:31
16	access to?	11:31
17	A. Yes. Like I said, questions around	11:31
18	integrations that they wanted to build.	11:31
19	Q. And by "integrations," do you mean access to	11:31
20	APIs?	11:31
21	A. That's part of it. But integrations	11:31
22	typically means like building out experiences.	11:31
23	Q. And in order to support that partner, you	11:31
24	needed to be knowledgeable about what they were	11:31
25	asking for; right?	11:31

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1	A. Not necessarily. We worked with partner	11:31
2	engineering, who did more of the technical list.	11:31
3	Q. But as a general matter, if they came to you	11:32
4	and they said, "We want to access these	11:32
5	capabilities," you did something to understand what	11:32
6	those were.	11:32
7	A. Not necessarily. So, again, I'm not the	11:32
8	technical experts, which is why there's product	11:32
9	managers involved and also partner engineering	11:32
10	involved.	11:32
11	Q. I understand you're not the technical	11:32
12	expert, but do you have a general understanding of	11:32
13	how this operated?	11:32
14	A. I don't understand what your definition of	11:32
15	general, like, understanding is.	11:32
16	Q. Well, here is an email string that's about	11:32
17	capabilities. Do you have a general understanding	11:32
18	of what "capabilities" are?	11:32
19	A. No, I don't.	11:32
20	Q. And do you have a general understanding of	11:32
21	what "auto_granted" means?	11:32
22	A. I don't recall.	11:32
23	Q. So they were asking for these things and you	11:32
24	were communicating what they were asking for, but	11:32
25	you didn't have any idea what it meant?	11:32

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1   A.   At that time, I -- I imagine I -- I was   11:32

2   helping to support it, but I don't remember it now.   11:33

3   Q.   Looking, again, at the -- on the list where   11:33

4   it says, "auto_granted_user_videos via Amazon," is   11:33

5   it your testimony that you have no understanding   11:33

6   whatsoever of what information Amazon could obtain   11:33

7   about users via the auto_granted_user_videos via   11:33

8   Amazon?   11:33

9   A.   So I don't know what technically came   11:33

10   through. I can see what it says, but I don't know   11:33

11   what technically is shared.   11:33

12   Q.   And who would know the answer to that at   11:33

13   Facebook?   11:33

14   A.   A product manager or a partner engineer.   11:33

15   Well, I don't know if it's a partner engineer, but   11:33

16   engineering and product managers.   11:33

17   Q.   And are they assigned to particular   11:33

18   partners, or they are just general positions at   11:33

19   Facebook?   11:33

20   A.   General positions.   11:33

21   Q.   And so if in the context of this email, in   11:33

22   which you apparently don't understand any of the   11:34

23   technical aspects, if someone emailed you and said,   11:34

24   "Jackie, what does auto_granted_friends_likes via   11:34

25   Amazon mean?" who specifically would you ask to   11:34

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1	answer that question?	11:34
2	A. I don't remember. I don't know off the top	11:34
3	of my head.	11:34
4	Q. If you can flip back in the string to	11:34
5	page 3. You will see an email from Sorin Gherman at	11:34
6	Amazon to Jessica Jenks at Facebook, dated May 3rd,	11:34
7	2013. Do you see that in the string?	11:35
8	A. Yes.	11:35
9	Q. So if you read that email, it says:	11:35
10	"Hi Marie,	11:35
11	"We are looking into using FQL to sync	11:35
12	Facebook friends since that is much	11:35
13	more efficient than fetching all the	11:35
14	friends each time. We found an issue	11:35
15	though: We are not able to get back	11:35
16	the phone field anymore (to which we	11:35
17	got access earlier via the normal	11:35
18	Graph API after Vikas Gupta helped us	11:35
19	with whitelisting.)	11:35
20	"Can you please tell us how to get	11:35
21	the phone field in the User table via	11:35
22	FQL, since it's not part of the public	11:35
23	API?"	11:35
24	Do you see that?	11:35
25	A. Yes.	11:35

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1	Q. What is the "public API"?	11:35
2	A. Developer.Facebook.com.	11:35
3	Q. Okay. So those are APIs that are available	11:35
4	to every developer; right?	11:35
5	A. Available to apply to. It doesn't mean that	11:35
6	they'll get access to it.	11:35
7	Q. Now, this phone -- the phone field that	11:35
8	they're discussing is not available via the public	11:36
9	API; is that right?	11:36
10	A. From what the email says. I don't know	11:36
11	specifically --	11:36
12	Q. So how would --	11:36
13	A. -- if there was a way.	11:36
14	Q. How would an API be available to Amazon if	11:36
15	it's not available through a public API?	11:36
16	A. I don't know. I don't understand what	11:36
17	the -- what do you mean by that?	11:36
18	Q. Well, I guess, look at the email --	11:36
19	A. Uh-huh.	11:36
20	Q. -- this is information that wasn't available	11:36
21	for the public API, but Amazon was able to receive	11:36
22	it; right? That's what they're saying.	11:36
23	A. Yes, I see that.	11:36
24	Q. And the way they were able to receive it is	11:36
25	they "got access earlier via the normal Graph API	11:36

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1	after Vikas Gupta helped us with whitelisting."	11:36
2	What does that mean?	11:36
3	A. So I don't know. I wasn't in that	11:36
4	interaction.	11:37
5	Q. So you don't know what "whitelisting" is?	11:37
6	A. As a concept or...	11:37
7	Q. As expressed in this email, do you know what	11:37
8	"whitelisting" is?	11:37
9	A. I know of it as a concept, but not specific	11:37
10	to that scenario because I wasn't there.	11:37
11	Q. So as a concept, how would it have enabled	11:37
12	Amazon to get information that wasn't available to	11:37
13	the public API?	11:37
14	A. Well, so I can't make any assertions about	11:37
15	this scenario, but at a high level, around the	11:37
16	concepts of whitelisting, it's to grant access.	11:37
17	Q. Explain that.	11:37
18	A. In -- I don't know the technical details, so	11:37
19	that's as much as I know.	11:37
20	Q. So what you can tell from this email is that	11:37
21	Amazon was able to obtain this phone information via	11:37
22	whitelisted access to the phone field; is that	11:37
23	right?	11:37
24	MR. FALCONER: Objection. Foundation.	11:37
25	THE WITNESS: Sorry. Can you say that	11:37

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1	again?	11:38
2	BY MR. LOESER:	11:38
3	Q. Can you tell from this email that Amazon was	11:38
4	able to access this phone field via whitelisting as	11:38
5	opposed to via the public API?	11:38
6	A. So, again, I was not there, so I don't -- I	11:38
7	don't know beyond what the email says.	11:38
8	Q. Well, let's move up the string, and if you	11:38
9	look at the email from you, Jackie Chang, to	11:38
10	Marie --	11:38
11	A. Uh-huh.	11:38
12	Q. -- dated May 3rd, subject same, "FQL	11:38
13	question." So you were personally involved in this	11:38
14	email string; right?	11:38
15	A. It looks that way, yes.	11:38
16	Q. Okay. And why don't you read what you wrote	11:38
17	that starts with No. 1. Let me start it for you, it	11:38
18	says, at the top of your email:	11:38
19	"Chris Daniel to help set expectation	11:38
20	at the highest level & Bryan who's	11:39
21	also now working with Amazon."	11:39
22	And then why don't you read what comes under	11:39
23	that?	11:39
24	A. "1/We should not be consulting on	11:39
25	deep mobile integration beyond SSO	11:39

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1	offerings for their developers until	11:39
2	Amazon commits to developing on	11:39
3	Open Graph for Kindle, etc. @Chris	11:39
4	& Bryan, we should be emphasizing	11:39
5	this understanding as it seems like	11:39
6	they're under the impression that	11:39
7	we're going to work with them on	11:39
8	this front.	11:39
9	"2/If they're asking for this	11:39
10	permission to be added into their	11:39
11	autogrant list - def. no. Even if	11:39
12	they're going to ask this as separate	11:39
13	permissions, I don't think we're	11:39
14	going to approve them for this."	11:39
15	Q. You can stop there.	11:39
16	Does that refresh your recollection at all	11:39
17	as to what the conversation below that concerned	11:39
18	with these phone permissions?	11:39
19	A. I don't remember.	11:39
20	Q. Okay. And what is it that you're saying you	11:39
21	want from Amazon in exchange for providing this	11:39
22	phone permission?	11:40
23	A. It says:	11:40
24	"We should not be consulting on deep	11:40
25	mobile integration beyond SSO	11:40

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1	offerings for their developers until"	11:40
2	they "commit to developing on Open	11:40
3	Graph for Kindle..."	11:40
4	Q. Okay. So what are you saying there? What	11:40
5	does that mean?	11:40
6	A. I don't remember at this point.	11:40
7	Q. So you can see the words, and are you --	11:40
8	A. Yes.	11:40
9	Q. -- saying to Amazon that, we're not going to	11:40
10	give you these phone permissions unless you commit	11:40
11	to developing an Open Graph for Kindle?	11:40
12	MR. FALCONER: Objection.	11:40
13	BY MR. LOESER:	11:40
14	Q. Earlier we talked a bit about reciprocity.	11:40
15	Would this be an example of reciprocity, that you	11:40
16	will give them certain information if they give you	11:40
17	back something?	11:40
18	MR. FALCONER: Objection. Form.	11:40
19	THE WITNESS: So I don't remember this since	11:40
20	this was in 2013, so I can't make that assertion.	11:40
21	BY MR. LOESER:	11:41
22	Q. Well, I understand it was in 2013, but you	11:41
23	just read the email that you wrote, and you	11:41
24	understand what you wrote; right?	11:41
25	A. Not from 2013.	11:41

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```
 1        Q.   So is it fair to say that you want something   11:41

 2   from Amazon before you'll give something to Amazon?   11:41

 3   Is that clear from this email?                         11:41

 4        A.   Well, it says that we just shouldn't be      11:41

 5   consulting.                                             11:41

 6        Q.   Okay.  And, then, if Amazon commits to       11:41

 7   developing an Open Graph, does that mean, as you       11:41

 8   look at this, that if they commit to that, then you    11:41

 9   will consult with them on what you refer to here as    11:41

10   "deep mobile integration"?                             11:41

11        A.   I don't know.                                11:41

12        Q.   So, Miss Chang, are you telling the jury     11:41

13   that as you read the email that you wrote, you have    11:41

14   no understanding of what you meant?                    11:41

15             MR. FALCONER:  Objection.  Form.             11:41

16             THE WITNESS:  So I don't know now, given     11:41

17   that that was in 2013.  I don't remember enough to     11:41

18   make that assertion.                                   11:42

19   BY MR. LOESER:                                         11:42

20        Q.   So does the phrase "until Amazon commits"    11:42

21   mean something different now than it meant in 2013?    11:42

22        A.   I'm not sure I understand.                   11:42

23        Q.   Well, the way your sentence is structured,   11:42

24   it starts with something you will do for them and      11:42

25   ends with something that they will do for you; is      11:42
```

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1	that right?	11:42
2	A. So it says we should not be consulting on	11:42
3	deep mobile integrations beyond SSO offering for	11:42
4	their developers until Amazon commits to open --	11:42
5	developing on Open Graph.	11:42
6	Q. Okay. So you didn't say, We should never	11:42
7	consult with them on deep mobile integration; right?	11:42
8	A. It says we "should not."	11:42
9	Q. It doesn't say you should never. It says	11:42
10	until Amazon commits; right? So if Amazon committed	11:42
11	to developing Open Graph, then the way you -- the	11:42
12	information you wrote and expressed to all the	11:42
13	people that are on this email, you were setting up a	11:42
14	structure where you were giving them something if	11:43
15	they were giving you something; right?	11:43
16	And isn't that just the basic structure of	11:43
17	the relationship that Facebook had with its	11:43
18	partners? It was sharing information as long as it	11:43
19	got information; right?	11:43
20	MR. FALCONER: Objection. Form.	11:43
21	THE WITNESS: No. I can't make that	11:43
22	assertion broadly about all partnerships.	11:43
23	BY MR. LOESER:	11:43
24	Q. Okay. What about this partnership,	11:43
25	Miss Chang? The Amazon partnership. Isn't that	11:43

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1	what this email clearly indicates?	11:43
2	MR. FALCONER: Objection. Form and asked	11:43
3	and answered.	11:43
4	THE WITNESS: So, again, I -- I see what it	11:43
5	says, but I don't recall from that time, so I can't	11:43
6	make that assertion.	11:43
7	MR. LOESER: Okay. We can go to the next	11:43
8	exhibit, which should be tab 5.	11:44
9	Actually, if we can go off the record for	11:44
10	one second. Give us three minutes.	11:44
11	THE VIDEOGRAPHER: Okay. Going off the	11:44
12	record. The time is 11:44.	11:44
13	(Off the record.)	11:44
14	THE VIDEOGRAPHER: We are back on the	11:48
15	record. The time is 11:48.	11:48
16	(Exhibit 5 marked for identification.)	11:48
17	BY MR. LOESER:	11:48
18	Q. Miss Chang, we are showing you what's now	11:48
19	been marked Exhibit 5, which we will screen share as	11:48
20	well, which is an email from Constantin, and I'm	11:48
21	sure I will get this last name wrong, but	11:49
22	Koumouzelis. Is that how you say that?	11:49
23	A. Sorry. I'm also trying to update the	11:49
24	Egnyte. I can't even say his last name. I call him	11:49
25	"KP."	11:49

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1	Q. Okay. So an email from KP to Visha Gupta --	11:49
2	A. Oh, sorry. Wrong person. Not the same	11:49
3	person.	11:49
4	Q. How do you say this person's last name?	11:49
5	A. I don't know how to say his last name.	11:49
6	Q. Call him "CK." How about that?	11:49
7	A. Okay.	11:49
8	Q. And it is an email sent Friday, August 16th,	11:49
9	and it goes to a number of people.	11:49
10	Visha Gupta, do you know who that is?	11:49
11	A. I think I know. I think I could see his	11:49
12	face, but I don't know well.	11:49
13	Q. Okay. And it also went to Douglas Purdy.	11:49
14	Do you know who that is; right?	11:49
15	A. Yes.	11:49
16	Q. And his job was what?	11:49
17	A. Director of Platform Product, I think.	11:49
18	Q. And there are several other people that	11:50
19	received this email, and you're familiar with who	11:50
20	these people are; right?	11:50
21	A. Yes, I know who they are.	11:50
22	Q. And these are people that you worked with	11:50
23	regularly at the time?	11:50
24	A. Not necessarily regularly. I probably know	11:50
25	them more via emails.	11:50

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1	Q. Who is Eddie O'Neil?	11:50
2	A. I believe in 2013, he was a product manager.	11:50
3	Q. And do you see the subject line says "Re:	11:50
4	Platform 3.0 2nd rev"?	11:50
5	A. Yes, I see that.	11:50
6	Q. An attachment "Platform 3.0.docx." Do you	11:50
7	see that?	11:50
8	A. Yes.	11:50
9	Q. Now, you're not a recipient of this email,	11:50
10	but do you recall Platform 3.0, what that was all	11:50
11	about?	11:50
12	A. Not specifically.	11:50
13	MR. LOESER: Okay. Well, why don't we look	11:50
14	at the attachment. Maybe that will refresh your	11:51
15	recollection.	11:51
16	We will mark Exhibit 6.	11:51
17	(Exhibit 6 marked for identification.)	11:51
18	THE WITNESS: Sorry. Am I supposed to open	11:51
19	it?	11:51
20	BY MR. LOESER:	
21	Q. Yes. We can go to Exhibit 6.	11:51
22	A. I don't see anything.	11:51
23	Q. It takes a minute. It's traveling through	11:51
24	space.	11:51
25	A. Oh, okay.	11:51

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1	Q. If you can take a minute to familiarize	11:51
2	yourself with the document.	11:51
3	A. Yes, may I have a minute? Thank you.	11:51
4	Q. So I will have a couple of questions about a	11:53
5	few paragraphs of this. So when you have had enough	11:53
6	time to familiarize yourself with the document --	11:53
7	A. Do I need to read the whole thing or...	11:53
8	Q. No.	11:53
9	A. Okay. Okay.	11:53
10	Q. In looking at this document and reading what	11:53
11	you have read, do you recall what Platform 3.0 was?	11:53
12	A. Not specifically.	11:53
13	Q. Do you recall being involved in discussions	11:53
14	about the evolution to Platform 3.0?	11:53
15	A. Not specifically.	11:53
16	Q. Do you recall in general?	11:54
17	A. I don't just because it's been a really long	11:54
18	time so I don't know --	11:54
19	Q. Well, let's look at the --	11:54
20	A. -- specific to 3.0. Sorry.	11:54
21	Q. Okay. Was it referred to in ways other than	11:54
22	"Platform 3.0"?	11:54
23	A. I don't know.	11:54
24	Q. Do you recall the transition from Graph API	11:54
25	version 1 to Graph API version 2?	11:54

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1	A. I recall a transition, but I don't know if	11:54
2	it was specifically that.	11:54
3	Q. You don't recall if that was what the	11:54
4	introduction of the Platform 3.0 is?	11:54
5	A. I don't just because Platform has spanned a	11:54
6	long period of time, so I don't -- I don't remember	11:54
7	all the specific changes.	11:54
8	Q. Well, let's look at the beginning of this	11:54
9	document on "Overview." It says:	11:54
10	"Platform 3.0 (WT) is a focus on	11:54
11	user trust. We received a lot of	11:54
12	feedback from users about how they	11:54
13	feel about using Facebook connected	11:54
14	apps -- what information is shared	11:54
15	with developers? Why do they need	11:55
16	it? Why are their friends spamming	11:55
17	them? Are they spamming their	11:55
18	friends?"	11:55
19	Did you receive any of that feedback?	11:55
20	A. Not directly.	11:55
21	Q. Okay. How about indirectly?	11:55
22	A. What do you mean by that?	11:55
23	Q. Were you aware of that feedback?	11:55
24	A. I -- I'm not -- well, I guess, I don't like	11:55
25	recall anything specific. But I've heard it	11:55

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```
 1   mentioned, but I don't know anything specific about    11:55

 2   that feedback.                                         11:55

 3        Q.    Okay.  Well, let's read on.                 11:55

 4              "We're listening.  Our goal is create       11:55

 5              a platform for developers focused on        11:55

 6              great user experiences, where users         11:55

 7              feel comfortable with the information        11:55

 8              the app has access to and feel safe         11:55

 9              from over sharing or spamming their         11:55

10              friends."                                   11:55

11              Do you see that?                            11:55

12        A.    Yes.                                        11:55

13        Q.    Then down below, the next paragraph says:   11:55

14              "After a lot of consideration we've         11:55

15              decided to make some changes to the         11:55

16              Facebook platform to act on this            11:56

17              feedback."                                  11:56

18              Do you see that?                            11:56

19        A.    Yes.                                        11:56

20        Q.    It says:                                    11:56

21              "This is not a decision we've taken         11:56

22              lightly and some of these changes           11:56

23              will be painful for our developers          11:56

24              in the short term.  However, in the         11:56

25              process of providing users with the         11:56
```

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1	control they want/need we are	11:56
2	working towards a shared goal" --	11:56
3	DEPOSITION REPORTER: "However, in the	11:56
4	process of providing users with the control..." Go	11:56
5	ahead, please.	
6	BY MR. LOESER.	
7	Q. "...they want/need, we are working	
8	towards a shared goal of greater	11:56
9	engagement and long-term health of	11:56
10	the ecosystem that will mutually	11:56
11	benefit both users and our	11:56
12	developers."	11:56
13	Do you see that?	11:56
14	A. Yes.	11:56
15	Q. Now, Miss Chang, do you recall being	11:56
16	involved in the -- making the changes that are	11:56
17	referred to here?	11:56
18	A. I don't.	11:56
19	Q. Why don't we go down this document to	11:56
20	page 2, under the heading "Breaking Changes."	11:56
21	Do you remember your involvement and the	11:56
22	conversation about breaking changes?	11:56
23	A. I remember breaking changes as a concept,	11:56
24	but I don't remember specific conversations.	11:57
25	Q. Okay. What was "breaking changes" as a	11:57

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1	concept?	11:57
2	A. Breaking changes is changes that the	11:57
3	platform would make that would potentially break the	11:57
4	experience of the -- of what the developer built.	11:57
5	Q. Do you see below "Breaking Changes" it says,	11:57
6	"Deprecate friend permissions." Is that right?	11:57
7	A. Sorry, where is that one?	11:57
8	Q. It's on screen share, as well, if that's	11:57
9	easier.	11:57
10	A. Okay. Oh, sorry. Yes.	11:57
11	Q. Okay. And if you read what it says, it	11:57
12	says:	11:57
13	"We are removing the ability for	11:57
14	users to share data that belongs to	11:57
15	their friends who have not installed	11:57
16	the app. Our philosophy is that	11:57
17	users should be empowered to share	11:58
18	their data with an app when they	11:58
19	have expressed intent. Users should	11:58
20	not be able to act as a proxy to	11:58
21	access personal information about	11:58
22	friends that have not expressed any	11:58
23	intent in using the app."	11:58
24	Do you see that?	11:58
25	A. Yes.	11:58

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1	Q.	"Apps can still power great,	11:58
2		meaningful social experiences for	11:58
3		their users and prompt a user to	11:58
4		invite their friends to participate	11:58
5		in the experience. Once a friend	11:58
6		has installed the app, they can	11:58
7		determine how much information they	11:58
8		are willing to share at their	11:58
9		discretion."	11:58
10		Do you see that?	11:58
11	A.	Yes.	11:58
12	Q.	Do you recall conversations around	11:58
13	deprecating friends permissions?		11:58
14	A.	I don't.	11:58
15	Q.	You have no memory of that?	11:58
16	A.	Not specifically.	11:58
17	Q.	Do you know what "deprecate" means?	11:58
18	A.	Yes. To -- to remove or wind down or end.	11:58
19	Q.	And so what Platform 3.0 was intended to	11:58
20	introduce was the concept of empowering users to		11:59
21	share their data with an app when they have		11:59
22	expressed intent; is that right?		11:59
23	A.	Whatever was stated there.	11:59
24	Q.	And so if a user hadn't expressed that	11:59
25	intent, their information shouldn't be shared, and		11:59

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1	that's what would be taken away by deprecating	11:59
2	friend permissions. Is that your -- is that your	11:59
3	understanding?	11:59
4	A. I don't know specifically to make that	11:59
5	assertion beyond what I'm reading.	11:59
6	Q. You have no independent memory of the	11:59
7	deprecation of friend permissions?	11:59
8	A. No.	11:59
9	Q. That wasn't a significant event in your	11:59
10	mind?	11:59
11	A. No.	11:59
12	Q. Why don't we go down the document to the	11:59
13	heading that says, "Deprecate read_stream	11:59
14	permissions."	11:59
15	Do you see that?	12:00
16	A. Yes.	12:00
17	Q. And this says:	12:00
18	"We will be deprecating the ability	12:00
19	for developers to request access to	12:00
20	a users news feed. This is an	12:00
21	extremely powerful API that exposes	12:00
22	a large amount of personal data.	12:00
23	Users are often unclear how this	12:00
24	information is used and unaware of	12:00
25	exactly how much information they	12:00

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1	are releasing to apps. There is no	12:00
2	good way to make this functionality	12:00
3	work with our enhanced focus on user	12:00
4	trust and we will be removing it in	12:00
5	the upcoming months."	12:00
6	Do you remember a conversation regarding the	12:00
7	read_stream permission?	12:00
8	A. I don't believe I was in any specific	12:00
9	conversations around it.	12:00
10	Q. You don't recall any involvement you had in	12:00
11	figuring out which partners would continue to have	12:00
12	read_stream permissions and which would not?	12:00
13	A. I don't recall specifically.	12:00
14	Q. And you don't recall any conversations with	12:00
15	partners about which ones would continue to have	12:00
16	friends permissions and which ones do not?	12:00
17	A. I don't recall specifically.	12:01
18	Q. Do you have any recollection of audits that	12:01
19	were done in 2013 to determine whether to revoke API	12:01
20	permissions for large numbers of apps and	12:01
21	developers?	12:01
22	A. I don't specifically remember.	12:01
23	Q. Do you generally remember?	12:01
24	A. I remember a general ask, but I don't	12:01
25	remember the details of it.	12:01

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1	Q. Was misuse of APIs by partners something	12:01
2	that you ever discussed with your colleagues?	12:01
3	A. I don't remember.	12:01
4	Q. Do you recall audits in 2013 that showed	12:01
5	that friends permissions APIs were widely abused?	12:01
6	A. I don't remember.	12:01
7	Q. You have no recollection of that whatsoever?	12:02
8	A. No.	12:02
9	Q. Do you remember what your job was in 2013?	12:02
10	A. I believe it was a partner manager.	12:02
11	MR. LOESER: I will move to Exhibit 7.	12:02
12	(Exhibit 7 marked for identification.)	12:02
13	BY MR. LOESER:	12:02
14	Q. It will show up shortly and we will screen	12:02
15	share the exhibit as well. It's thinking. You will	12:02
16	get it. We're waiting for the document to load.	12:02
17	Okay. Do you have it? Can you see the	12:03
18	document? There we go.	12:04
19	All right. I'm showing you Exhibit 7, which	12:04
20	is an email from KP. We can agree to call this	12:04
21	person "KP"; right?	12:04
22	A. Yes.	12:04
23	Q. You know who I'm talking to when I say "KP"?	12:04
24	A. Yes.	12:04
25	Q. Okay. And it's an email to Ime Archibong	12:04

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1	and yourself; is that right?	12:04
2	A. Yes.	12:04
3	Q. And it's dated August 21st, 2013. The	12:04
4	subject "Re: T0/Special Cases for P3	12:04
5	consideration." Is that right?	12:04
6	A. Yes.	12:04
7	Q. There is an attachment that says, "All apps	12:04
8	with friends permissions."	12:04
9	Do you see that?	12:04
10	A. Yes.	12:04
11	Q. Can you tell me what "T0/special Cases for	12:04
12	P3 consideration" relates to?	12:04
13	A. "T0" means important, like top priority,	12:04
14	special cases -- I don't know what "P3" is referring	12:05
15	to.	12:05
16	Q. Do you think that might refer to Platform 3	12:05
17	that we just went through?	12:05
18	A. I -- I don't recall specifically.	12:05
19	Q. Okay. Do you want to take --	12:05
20	MR. FALCONER: My apologies. My mic was	12:05
21	muted. I had a form objection to that last	12:05
22	question. Sorry. I was late on that.	12:05
23	BY MR. LOESER:	12:05
24	Q. I'm going to ask you some questions about	12:05
25	this email string, and I can just jump right in or	12:05

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1	if you want to flip through the document first,	12:05
2	that's fine too.	12:05
3	A. Yes. If I can have one minute to look, that	12:05
4	would be great. Thank you.	12:05
5	Yes, okay.	12:06
6	Q. Okay. Why don't we go to the beginning of	12:06
7	the email string, so if you flip through to the end	12:06
8	of this document, on the second-to-the-last page,	12:06
9	there's an email from Ime Archibong to you, dated	12:06
10	August 21st, 2013. Do you see that?	12:06
11	A. Yes.	12:06
12	Q. And it has the same subject line we read	12:06
13	before?	12:06
14	A. Yes.	12:06
15	Q. And that email forwards a string -- forwards	12:06
16	an email that you sent down in the paragraph below	12:07
17	it. Do you see that? You sent it at 2:30 a.m.	12:07
18	A. Yes.	12:07
19	Q. Okay. Let's look at that email. Why don't	12:07
20	you read the first paragraph of what you wrote to	12:07
21	Ime and Chris.	12:07
22	A. "Working with KP to further synthesize	12:07
23	P3 impact by breaking out T0 partners	12:07
24	with non-standard agreements and	12:07
25	specific categories of impact that"	12:07

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1	would -- "that we should address.	12:07
2	KP is working on the pulling the same	12:07
3	analysis of the friend data, but	12:07
4	we're also working in parallel to	12:07
5	parse out key partnerships/scenarios	12:07
6	that we should be solving for."	12:07
7	Q. And so does this refresh your recollection	12:07
8	about your involvement in the Platform 3?	12:07
9	A. Not too much because this was the period I	12:07
10	was moving off of this and working on Internet.org,	12:08
11	so I don't recall a lot of the specifics at this	12:08
12	time since I was handing it off.	12:08
13	Q. Okay. But looking at this email, it's fair	12:08
14	to say that this discussion is in the context of the	12:08
15	changes to the Facebook platform that would	12:08
16	deprecate certain APIs including friends	12:08
17	permissions; is that right?	12:08
18	A. So I don't remember.	12:08
19	Q. You just went through the P3 document we	12:08
20	looked at before, which described the deprecation of	12:08
21	friends permissions; right?	12:08
22	A. Correct.	12:08
23	Q. And do you have any reason to now think that	12:08
24	the Platform 3 did not involve the deprecation of	12:08
25	friend permissions?	12:08

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1	A. So I --	12:08
2	MR. FALCONER: Objection to form.	12:08
3	THE WITNESS: So I don't remember enough to	12:08
4	make that connection.	12:08
5	BY MR. LOESER:	12:08
6	Q. So looking at your email, it looks like you	12:08
7	came up with a format for dealing with T0 partners	12:08
8	with non-standard agreements and specific	12:09
9	categories; is that right?	12:09
10	DEPOSITION REPORTER: Excuse me. There was	12:09
11	an interruption in the audio. Can you repeat your	12:09
12	question, please, Counsel.	12:09
13	BY MR. LOESER:	12:09
14	Q. Yeah. Looking at your email, it appears	12:09
15	that you're sorting out which partners would lose	12:09
16	access to friends and would reach with permissions	12:09
17	and which ones would not; right?	12:09
18	A. So, then, I don't remember enough to make	12:09
19	that assertion.	12:09
20	Q. Okay. Well, let's just look through your	12:09
21	tabs. The first tab you have -- these are your	12:09
22	words; right? You wrote this email?	12:09
23	A. It looks like it, yes.	12:09
24	Q. The T0 tab -- and, again, "T0" means	12:09
25	something --	

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1	A.	T0.	12:09
2	Q.	T0, that means important?	12:09
3	A.	I believe top priority.	12:09
4	Q.	Okay. So you have three bullets there;	12:09
5	right?		12:09
6	A.	Yes.	12:09
7	Q.	Okay. The first bullet is:	12:09
8		"Partners with non-standard agreement	12:10
9		and their backward compatibility	12:10
10		clause."	12:10
11		Do you know what that refers to?	12:10
12	A.	I don't remember.	12:10
13	Q.	The second bullet says:	12:10
14		"Existing integrations impacted."	12:10
15		Do you know what that refers to?	12:10
16	A.	I don't remember.	12:10
17	Q.	And the third bullet is:	12:10
18		"Future integrations in planning."	12:10
19		Do you know what that refers to?	12:10
20	A.	I don't remember.	12:10
21	Q.	Okay. But looking at this email, and read	12:10
22	the email, see if it refreshes your recollection.		12:10
23	It appears that you are talking about the impact		12:10
24	that would occur because of the deprecation of		12:10
25	certain permissions; right? That's what this email		12:10

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1	is about?	12:10
2	A. Sorry. Can you say that question again?	12:10
3	Q. Yeah. Looking at this email, it appears	12:10
4	that you were involved in making recommendations for	12:10
5	how partners should be impacted by the deprecation	12:11
6	of these permissions that are discussed here.	12:11
7	A. I believe I was asked to pull together a	12:11
8	spreadsheet for analysis, but I don't really recall	12:11
9	like in-depth details around that.	12:11
10	Q. Do you recall your involvement in coming up	12:11
11	with a recommendation for how to determine if a	12:11
12	partner should continue to have access to friends	12:11
13	permissions or not?	12:11
14	A. I don't remember. Again, I was	12:11
15	transitioning so I -- this was not the top of my	12:11
16	mind.	12:11
17	Q. This didn't seem important to you?	12:11
18	A. No.	12:11
19	Q. Let's look under your "Risk Assessment Tab."	12:11
20	Your first bullet says:	12:11
21	"PR risk: Potential partners/cases	12:11
22	that may cause negative press."	12:11
23	What are you saying there?	12:11
24	A. I am saying what it states, which is "PR	12:11
25	risk: Potential partners/cases that may cause	12:12

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1	negative press."	12:12
2	Q. And what you mean there is when you take	12:12
3	away these friends and read permissions, there could	12:12
4	be negative press?	12:12
5	A. Again, I --	12:12
6	MR. FALCONER: Objection. Form.	12:12
7	THE WITNESS: -- I don't recall at the time	12:12
8	to specify exactly what it is connected to.	12:12
9	BY MR. LOESER:	12:12
10	Q. Just a blank slate for you?	12:12
11	MR. FALCONER: Objection. Form.	12:12
12	THE WITNESS: Sorry. Is that a question	12:12
13	or...	12:12
14	BY MR. LOESER:	12:12
15	Q. Yeah. Yeah. Even looking at the email that	12:12
16	you wrote about this, you just can't remember	12:12
17	anything about it?	12:12
18	A. Yes. So, again, I was transitioning to a	12:12
19	new role, so this was not the top of my mind, and I	12:12
20	don't remember this.	12:12
21	Q. Is it fair to say that it was at the top of	12:12
22	your mind when you wrote this?	12:12
23	A. I don't remember at that time.	12:12
24	Q. Well, let's look at the next bullet:	12:12
25	"Strategic value: Key integrations	12:13

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1	that use read stream or friend data	12:13
2	and drive value to Facebook. Should	12:13
3	decide if we allow certain use cases	12:13
4	that are of strategic value to	12:13
5	Facebook."	12:13
6	What does it mean if something is of	12:13
7	"strategic value to Facebook"?	12:13
8	A. So I can't infer what it meant at that time,	12:13
9	but strategic value generally means something that	12:13
10	is of business value.	12:13
11	Q. Okay. And so you're making a recommendation	12:13
12	here for how to deal with integrations that involve	12:13
13	strategic value; is that right?	12:13
14	A. I don't remember specifically, so I don't	12:13
15	know how to answer that.	12:13
16	Q. Okay. It looks like in the email, you knew	12:13
17	enough about what read stream was or friend data to	12:13
18	use those words in this email and talk about what	12:13
19	should happen with that?	12:14
20	A. So, again, I don't remember enough at the	12:14
21	time to say that was the state of my mind. I don't	12:14
22	know.	12:14
23	Q. And what do you mean when you say, "Should	12:14
24	decide if we allow certain use cases that are of	12:14
25	strategic value to Facebook"?	12:14

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1	MR. FALCONER: Objection. Asked and	12:14
2	answered.	12:14
3	THE WITNESS: Sorry. What was the question	12:14
4	again?	12:14
5	BY MR. LOESER:	12:14
6	Q. So this conversation, as this email string	12:14
7	shows, is about the deprecation of the read stream	12:14
8	and friend data permissions; right?	12:14
9	A. Again, I don't remember enough to say that.	12:14
10	I don't know.	12:14
11	Q. Okay. You understand from the Platform 3	12:14
12	document we just went through that those were the	12:14
13	permissions that were going to be deprecated with	12:14
14	Platform 3?	12:14
15	MR. FALCONER: Objection. Form and	12:15
16	foundation.	12:15
17	THE WITNESS: So, yes, I read that, but I	12:15
18	don't know or remember enough to connect the two	12:15
19	directly.	12:15
20	BY MR. LOESER:	12:15
21	Q. What does it mean to "drive value to	12:15
22	Facebook"?	12:15
23	A. Meaning there's business value.	12:15
24	Q. Okay. When you say "key integrations," what	12:15
25	are key integrations? What does "integrations"	12:15

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1	refer to?	12:15
2	A. Like generally or...	12:15
3	Q. They're your words and your email so...	12:15
4	A. Right. So I don't -- I don't know	12:15
5	specifically in that context, but "key integrations"	12:15
6	generally would mean integrations with apps.	12:15
7	Q. Okay. So you're referring to integrations	12:16
8	with apps that use read stream and friend data.	12:16
9	Do you know what that means, to use read	12:16
10	stream and friend data?	12:16
11	MR. FALCONER: Objection. Form.	12:16
12	THE WITNESS: Again, I don't remember.	12:16
13	BY MR. LOESER:	12:16
14	Q. You don't remember what "read stream and	12:16
15	friend data" means in the email you wrote?	12:16
16	A. No.	12:16
17	Q. And so looking at these words all put	12:16
18	together in this sentence, give me your best	12:16
19	understanding of what you meant when you said, "key	12:16
20	integrations with read stream and friend data and	12:16
21	drive value to Facebook."	12:16
22	A. Again, I can't really speculate like, at	12:16
23	that time, what I was thinking. It was in 2013, so	12:16
24	I don't remember.	12:16
25	Q. Okay. And looking at the email you wrote,	12:16

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1	it doesn't refresh your recollection at all? Just a	12:16
2	blank slate what this email is about?	12:16
3	A. Yes. Again, I was moving to another role so	12:16
4	this was not top of my mind.	12:16
5	Q. But right now, you read the email; right?	12:17
6	You're not moving to another role right now, are	12:17
7	you?	12:17
8	A. No.	12:17
9	Q. So you're able to focus right now on what	12:17
10	this email says; right?	12:17
11	A. Yes, I can read it.	12:17
12	Q. And reading these words right now, you have	12:17
13	no understanding of what it referred to?	12:17
14	A. Correct.	12:17
15	Q. You understand that you're under oath;	12:17
16	right?	12:17
17	A. Yes.	12:17
18	MR. FALCONER: Objection. Argumentative.	12:17
19	BY MR. LOESER:	12:17
20	Q. Let's go to the beginning of this string.	12:17
21	Let's look at the -- is KP an important person at	12:17
22	Facebook?	12:17
23	MR. FALCONER: Objection. Form.	12:17
24	THE WITNESS: He's no longer at Facebook.	12:17
25	/ / /	12:17

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```
 1   BY MR. LOESER:                                      12:17

 2       Q.   When he was there, if he sent you an email,  12:17

 3   is that something you likely would just ignore?    12:17

 4       A.   I don't understand.  What do you mean by   12:17

 5   that?  I generally try not to ignore --            12:17

 6       Q.   So on August 21st, 2013 --                 12:18

 7       A.   -- email.                                  12:18

 8       Q.   -- when you received an email from KP, it's  12:18

 9   likely that you read it; right?                    12:18

10       A.   I don't recall.  He's at this time a partner 12:18

11   manager, so I've already moved on to working on    12:18

12   Internet.org.                                      12:18

13       Q.   So are you saying maybe you just didn't even 12:18

14   read his email?                                    12:18

15       A.   I don't -- I don't remember.  I think it's  12:18

16   possible.  I don't -- I just don't remember        12:18

17   specifically.                                      12:18

18       Q.   Well, let's look at -- he read your email,  12:18

19   so let's look at what he said about it.  If you look  12:18

20   at the second paragraph he writes:                 12:18

21            "A little update from my end, and how     12:18

22            I think we should tie this to what        12:18

23            Jackie has put together."                 12:18

24            Now, the "Jackie" he is referring to is you;  12:18

25   right?                                             12:18
```

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1	A.	Correct.	12:18
2	Q.	"Simon managed to pull a list of 40k+	12:18
3		apps."	12:18
4		That means 40,000; right?	12:18
5	A.	I believe so.	12:18
6	Q.	"...40k+ apps that request and make	12:19
7		use of the friends_permissions. You	12:19
8		can see all those apps in the	12:19
9		attached. The most interesting data	12:19
10		points, having reviewed the top 250	12:19
11		apps are the following."	12:19
12		Do you see that?	12:19
13	A.	Yes.	12:19
14	Q.	Okay. Let's go down to No. 3. Can you read	12:19
15	the paragraph that's No. 3.		12:19
16	A.	"Strategic (12.5%: From Microsoft to	12:19
17		Yahoo to Pinterest, Path, Klout and the	12:19
18		likes. Some of them should obvious not	12:19
19		have access such as MySpace, Twitter,	12:19
20		YouTube, etc. In particular for	12:19
21		Strategic partners, we should use the	12:19
22		framework developed by Jackie.	12:19
23		Recommendation: User Jackie's	12:19
24		framework."	12:19
25	Q.	Okay. So KP was endorsing the framework	12:20

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1	that you came up with; right?	12:20
2	A. That's how it reads, yes.	12:20
3	Q. And that framework is the one that started	12:20
4	this email string; is that right?	12:20
5	A. That's what it seems to be.	12:20
6	Q. And strategic partners, those are the	12:20
7	really -- those are really important partners;	12:20
8	right?	12:20
9	A. Yes. I believe so, yeah.	12:20
10	Q. Those are the ones that drive value to	12:20
11	Facebook then?	12:20
12	MR. FALCONER: Objection. Form.	12:20
13	THE WITNESS: I guess that's a little broad,	12:20
14	so I don't know. I think it depends.	12:20
15	BY MR. LOESER:	12:20
16	Q. Okay. But these strategic partners that are	12:20
17	listed here, Microsoft, Yahoo, Pinterest, Path,	12:20
18	CLOUT, those drove value to Facebook?	12:20
19	A. I believe so.	12:20
20	Q. And in -- KP's recommendation is to use	12:20
21	Jackie's framework; right?	12:21
22	A. That's what it says, yes.	12:21
23	Q. And your framework involved deciding if you	12:21
24	allow certain use cases that are of strategic value	12:21
25	to Facebook; right?	12:21

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1	MR. FALCONER: Objection. Form.	12:21
2	THE WITNESS: So I don't remember enough	12:21
3	beyond what it says in the email.	12:21
4	BY MR. LOESER:	12:21
5	Q. All right. But what it says in the email is	12:21
6	to use your framework and that was part of your	12:21
7	framework; right?	12:21
8	MR. FALCONER: Objection. Form and	12:21
9	foundation.	12:21
10	THE WITNESS: So I don't remember the	12:21
11	specific framework.	12:21
12	BY MR. LOESER:	12:21
13	Q. I'm not asking you if you remember this	12:21
14	specific framework. I'm asking you if, when he says	12:21
15	"use Jackie's framework," that refers to the	12:21
16	framework in the email; right? That's -- that's	12:21
17	there --	12:21
18	A. I --	12:21
19	MR. FALCONER: Same objections.	12:21
20	THE WITNESS: So, again, I don't know what	12:22
21	the framework is referenced to.	12:22
22	BY MR. LOESER:	12:22
23	Q. Well, now you don't know that -- when he	12:22
24	says "use Jackie's framework," you're saying you	12:22
25	don't know that that's the framework that begins	12:22

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1	this email string?	12:22
2	A. Yes. It was 2013. I don't remember that.	12:22
3	Q. Okay. But you just read this whole string	12:22
4	and it starts with a framework you proposed and ends	12:22
5	with KP saying use your framework. And --	12:22
6	A. It wasn't -- I think that email --	12:22
7	MR. FALCONER: Objection. Objection. Form	12:22
8	and foundation, but go ahead.	12:22
9	THE WITNESS: I think that email is	12:22
10	referring to a spreadsheet, so I don't know what	12:22
11	specific framework.	12:22
12	BY MR. LOESER:	12:22
13	Q. Miss Chang, we went through the email that	12:22
14	starts this string; right? And that's the email you	12:22
15	sent.	12:22
16	A. Correct.	12:22
17	Q. Okay. In the email you sent you describe a	12:22
18	framework for dealing with, in particular, key	12:22
19	integrations that use read_stream or friend data and	12:23
20	drive value to Facebook. That was included in your	12:23
21	framework; right?	12:23
22	MR. FALCONER: Objection. Form and	12:23
23	foundation.	12:23
24	THE WITNESS: So I wouldn't classify it as a	12:23
25	framework. It was -- it looks to be a spreadsheet	12:23

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1	requested by Ime and Chris for me to pull together.	12:23
2	BY MR. LOESER:	12:23
3	Q. I think the email makes it pretty clear the	12:23
4	spreadsheet is a list of the 40,000 apps that used	12:23
5	friends permissions; right? Isn't that what we	12:23
6	read?	12:23
7	A. I don't know what is specifically on that	12:23
8	spreadsheet.	12:23
9	Q. Well, it says right in the email what's on	12:23
10	it. It says:	12:23
11	"Simon managed to pull a list of	12:23
12	40,000 apps that requested to make	12:23
13	use of friends permissions. You can	12:23
14	see all of the apps in the attached."	12:23
15	So that is what the spreadsheet is; right?	12:23
16	MR. FALCONER: Objection. Form.	12:23
17	BY MR. LOESER:	12:23
18	Q. That is how it is described in this	12:23
19	document.	12:23
20	A. I --	12:23
21	MR. FALCONER: Same objection.	12:23
22	THE WITNESS: So I don't know. It sounds	12:23
23	like he's referring to a separate list that Simon	12:24
24	pulled together.	12:24
25	/ / /	12:24

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1	BY MR. LOESER:	12:24
2	Q. Right. It's attached, "all apps with	12:24
3	friends permissions." Do you see that?	12:24
4	A. Correct.	12:24
5	Q. Okay. So let's look at the bottom of KP's	12:24
6	email in which he -- under No. 3 he says, "...use	12:24
7	the framework developed by Jackie," and then let's	12:24
8	go to the bottom of this email he writes:	12:24
9	"As a general note, I think we need	12:24
10	to carry on with this exercise to	12:24
11	figure out if there are more apps	12:24
12	falling under different verticals	12:24
13	that we have not" yet -- "we have	12:24
14	not identified yet, before we can	12:24
15	make a decision for all the apps in	12:24
16	this vertical. For both the Newfeed	12:24
17	and the Friends permission audit, we	12:24
18	can use Jackie's framework to assess	12:24
19	KEEP/REMOVE for those partners	12:24
20	falling under the Strategic tabs and	12:24
21	then make up a decision based on the	12:24
22	criteria outlined by Jackie below."	12:24
23	So does that make it pretty clear that what	12:24
24	KP is referring to is what you outlined below?	12:25
25	A. Yes.	12:25

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1	MR. FALCONER: Objection. Form.	12:25
2	BY MR. LOESER:	12:25
3	Q. I'm sorry. Your answer was what?	12:25
4	A. I see that's what he wrote.	12:25
5	Q. Your answer was yes; right?	12:25
6	A. Well, what was the question?	12:25
7	MR. LOESER: Will you re-read the question.	12:25
8	(Record read as follows:	12:25
9	"Q. So does that make it pretty clear	12:24
10	that what KP is referring to is what you	12:25
11	outlined before?")	12:25
12	DEPOSITION REPORTER: And I got an answer,	
13	"yes."	12:25
14	MR. LOESER: As long as you got that answer.	12:25
15	MR. FALCONER: Derek, just a reminder, we	12:25
16	have about five minutes until we need to break.	12:25
17	MR. LOESER: I will just note for the record	12:25
18	that the attachment to this -- to Exhibit 7, "all	12:26
19	apps with friends permissions" that was produced in	12:26
20	a native format and we have not added it as an	12:26
21	exhibit because the app that collects all apps with	12:26
22	friends permissions which has 40,000-plus apps	12:26
23	covers 7,246 pages and has information on 42,222	12:26
24	apps.	12:26
25	/ / /	12:26

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 1   BY MR. LOESER:                                    12:26

 2        Q.   And Miss Chang, do you recall looking at the 12:26

 3   attachment to this email and paging through all   12:26

 4   those apps?                                        12:26

 5        A.   No.                                      12:26

 6             MR. LOESER:  Okay.  We can move on from that 12:26

 7   exhibit.                                           12:26

 8   BY MR. LOESER:                                     12:26

 9        Q.   Now, Miss Chang, you are aware that Graph 12:26

10   API version 1 was replaced with Graph API version 2; 12:27

11   right?                                             12:27

12        A.   I don't know specifically.              12:27

13        Q.   You're aware based upon the work you did 12:27

14   coming up with a format for how to deal with      12:27

15   strategic partners that in the transition to      12:27

16   Platform 3, friends permissions and read permissions 12:27

17   were deprecated from the public APIs; right?      12:27

18        A.   So, again, I don't remember.            12:27

19        Q.   You don't remember now, but you were    12:27

20   involved in that -- in those discussions in that  12:27

21   process then; right?                              12:27

22        A.   No, I can't make that assertion as I don't 12:27

23   remember.                                         12:27

24        Q.   Okay.  We just went through and spent quite 12:27

25   a bit of time on an email that included a format   12:27
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1	that you came up with for dealing with, among	12:27
2	others, strategic partners and that was in the	12:27
3	context of Platform 3 implementation; right?	12:27
4	MR. FALCONER: Objection. Argumentative.	12:27
5	THE WITNESS: So, again, I don't know.	12:27
6	BY MR. LOESER:	12:27
7	Q. Now, Miss Chang, you were directly involved	12:28
8	in making the determination -- coming up with a	12:28
9	framework for the determination of what partners	12:28
10	would continue to have access to friends	12:28
11	permissions; right?	12:28
12	A. So, again, I don't remember enough to say	12:28
13	that it was a determination. I just prepared a	12:28
14	spreadsheet that was requested by Ime and Chris, as	12:28
15	it said in the email.	12:28
16	Q. Tell me everything you can remember about	12:28
17	your involvement in figuring out which partners	12:28
18	should continue to have access to friends	12:28
19	permissions.	12:28
20	A. So, again, I don't remember. I moved on to	12:28
21	Internet.org. I don't know what happened after that	12:28
22	spreadsheet.	12:28
23	Q. I didn't ask you if you remember what	12:28
24	happened after that. I am just asking you to	12:28
25	describe for me, what is the sum total of what you	12:28

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1	remember about your role in figuring out which	12:28
2	partners would continue to have access to friends	12:28
3	permissions.	12:29
4	A. I don't remember.	12:29
5	Q. Did you receive annual performance reviews?	12:29
6	A. In what year?	12:29
7	Q. In any year.	12:29
8	A. I received a performance review.	12:29
9	Q. And in connection with your performance	12:29
10	review, were you required to describe what you did	12:29
11	during the year that was being reviewed?	12:29
12	A. I believe so, yes.	12:29
13	Q. And in those performance reviews, were you	12:29
14	careful to make sure that you described all of the	12:29
15	important, or at least the most important things,	12:29
16	you worked on?	12:29
17	A. At that time, yes.	12:29
18	Q. And so if this transition to Platform 3 and	12:29
19	your role in determining which partners would	12:29
20	continue to have access to friends permissions was	12:29
21	an important part of that year, that would be likely	12:29
22	discussed in the performance review?	12:30
23	A. I don't know. I can't speculate that.	12:30
24	Q. Okay. Would that be generally an accurate	12:30
25	statement, though, that the tasks that you performed	12:30

1	that were important were likely the tasks that were	12:30
2	discussed in your review?	12:30
3	A. I'm not sure. I don't know.	12:30
4	Q. What's the documentation that's created for	12:30
5	performance reviews?	12:30
6	A. I'm not sure I understand.	12:30
7	Q. Do you fill something out to describe the	12:30
8	work you've done?	12:30
9	A. So we have a tool, a performance tool, but I	12:30
10	don't know if that was -- I don't remember if that	12:30
11	was there that year.	12:30
12	Q. Do you recall -- well, what years do you	12:30
13	recall that being there?	12:30
14	A. I don't know -- I don't know specifically	12:30
15	what year, but it's -- I mean, I know it exists, but	12:30
16	I don't remember what year exactly it started.	12:30
17	Q. Do you recall that you generally were	12:30
18	reviewed every year?	12:31
19	A. I don't -- I don't think so.	12:31
20	Q. Okay. And do you recall any paperwork	12:31
21	whatsoever being handed to you in connection with	12:31
22	your performance reviews?	12:31
23	A. Paperwork or...	12:31
24	Q. Did you fill anything out at all? Did you	12:31
25	write anything down to describe the work you did	12:31

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1	that was being reviewed?	12:31
2	A. So, again, I think it depends on what year,	12:31
3	but there is a tool. We fill it out, so I don't --	12:31
4	I guess if you can be more specific.	12:31
5	Q. When you're being reviewed, do the people	12:31
6	you report to write something about you?	12:31
7	A. Generally?	12:31
8	Q. Generally.	12:31
9	A. Yes.	12:31
10	MR. LOESER: Counsel, I don't think we have	12:31
11	received any performance reviews from Miss Chang,	12:31
12	and to the extent any of them discuss any of the	12:31
13	topics related to this case, we would ask to make	12:31
14	sure that those are produced.	12:32
15	MR. FALCONER: Great. And we have just hit	12:32
16	12:30, so let's go ahead and take our lunch break.	12:32
17	It's going to be an hour, so we'll be back at 1:30.	12:32
18	Maybe 1:35, but somewhere in there.	12:32
19	MR. LOESER: Okay. Can we get a count on	12:32
20	time remaining?	12:32
21	THE VIDEOGRAPHER: Sure. Would you like me	12:32
22	to do that once we go off the record or right now?	12:32
23	MR. LOESER: Yeah, that's fine.	12:32
24	THE VIDEOGRAPHER: Okay. This marks the end	12:32
25	of media No. 2 in the deposition of Jackie Chang.	12:32

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1	Off the record. The time is 12:32.	12:32
2	(Lunch recess.)	12:32
3	THE VIDEOGRAPHER: This marks the beginning	13:35
4	of media No. 3 in the deposition of Jackie Chang.	13:35
5	We are back on the record. The time is 1:35.	13:35
6	BY MR. LOESER:	13:35
7	Q. Good afternoon, Miss Chang. When we left	13:35
8	off, we were talking about Exhibit 7. And as we	13:35
9	saw, there was an attachment indicated in that	13:35
10	exhibit that, in Exhibit 7, is described as "all	13:35
11	apps with friends permissions."	13:35
12	Do you recall our discussion of that?	13:35
13	A. Sorry. I'm just opening it up. Yes.	13:36
14	MR. LOESER: I would like to introduce as	13:36
15	Exhibit 8 the actual attachment, which we will	13:36
16	introduce as the native file Excel spreadsheet. And	13:36
17	then I will screen share and we can look through	13:36
18	some folders. This might take two hours to upload.	13:36
19	(Exhibit 8 marked for identification.)	13:36
20	MR. LOESER: Oh, look. It's already there.	13:36
21	BY MR. LOESER:	13:36
22	Q. And, Miss Chang, I will represent to you	13:36
23	that this is the attached spreadsheet that is	13:36
24	referred to in KP's August 21st, 2013 email. And if	13:36
25	you look at the bottom of the spreadsheet, there's a	13:36

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1	series of folders. Are you familiar at all with	13:37
2	Excel?	13:37
3	A. Yes, the service, yeah.	13:37
4	Q. And is that something -- do you use Excel	13:37
5	regularly?	13:37
6	A. I guess. Not lately, but yeah.	13:37
7	Q. Do you know how to navigate your way around	13:37
8	an Excel file?	13:37
9	A. Yes.	13:37
10	Q. Now, if you look at the bottom, there's a	13:37
11	series of folders that are identified; is that	13:37
12	right?	13:37
13	A. Yes.	13:37
14	Q. And do you see that it says, "All apps"?	13:37
15	A. Yes.	13:37
16	Q. And then there is a series of folders; the	13:37
17	first one "in-house apps," the second one "mobile"	13:37
18	apps, the next one, "Games," the next one	13:37
19	"Strategic" and it goes on. And there's a whole	13:37
20	bunch of folders.	13:37
21	Is it fair to say that those folders are	13:37
22	different kinds of apps?	13:37
23	A. If you're referring to the tabs, the tabs do	13:37
24	list app IDs.	13:38
25	Q. And are those also different kinds of	13:38

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1	partners? So there's --	13:38
2	MR. FALCONER: Objection. Form.	13:38
3	BY MR. LOESER:	13:38
4	Q. Would that be fair, there's mobile partners	13:38
5	and game partners and strategic partners? Are	13:38
6	those -- are the words "partners" and "apps" kind of	13:38
7	synonymous?	13:38
8	A. I don't know.	13:38
9	Q. Okay. But if you looked at these folders,	13:38
10	you would refer to them as different kinds of apps?	13:38
11	A. Yes, they are apps, or the ones with app	13:38
12	IDs.	13:38
13	Q. It looks like there's a list -- 1, 2, 3, 4,	13:38
14	5, 6, 7 -- there is a large number of different	13:38
15	types of apps indicated by these folders; right?	13:38
16	A. As I can see -- sorry, a question. Do I	13:38
17	have access to this fully or --	13:39
18	Q. No. Unfortunately, we are just screen	13:39
19	sharing.	13:39
20	A. Oh, okay. Got it.	13:39
21	MR. FALCONER: It is in the Exhibit Share if	13:39
22	you want to look at it.	13:39
23	THE WITNESS: Okay. Got it. I am going to	13:39
24	open it. Okay.	13:39
25	Sorry, can you repeat your question?	13:39

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 1   BY MR. LOESER:

 2       Q.   Yeah.  If you look down at the bottom where   13:39

 3   it lists all those different categories or types of   13:39

 4   apps, which of those types did you interact with in   13:39

 5   your role with partners?                             13:39

 6       A.   I can't make that assertion because I       13:39

 7   wouldn't say I'm tied to a tab.                      13:39

 8       Q.   Did you work with partners that were mobile 13:39

 9   apps?                                                13:39

10       A.   I worked with partners that may have had a  13:39

11   mobile app, but I did not work holistically on       13:39

12   mobile apps.                                         13:39

13       Q.   Okay.  And over the long time that you have 13:40

14   been working with partners, I gather that there were 13:40

15   lots of different types of partners that you worked  13:40

16   with that may have had a number of these different   13:40

17   types of apps.  Is that fair to say?                 13:40

18       A.   Sorry.  I don't understand that.  You mean  13:40

19   that fall into different categories or...            13:40

20       Q.   Yeah.  You work maybe with some mobile apps 13:40

21   and some game apps.  You work with partners that had 13:40

22   these different types of apps; right?                13:40

23       A.   No.  I don't know where I could classify    13:40

24   that with specificity.                               13:40

25       Q.   Can you just generally describe to me -- if 13:40
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1	you look at these different tabs, did you -- were	13:40
2	you involved in working with any of these different	13:40
3	types of apps?	13:40
4	A. I recognize applications.	13:40
5	Q. Well, let me just pick a few and ask you.	13:40
6	Did you interact with any partners that had fitness	13:41
7	apps?	13:41
8	A. Yes. I've worked with Nike.	13:41
9	Q. Okay. Did you interact with any partners	13:41
10	that have games apps?	13:41
11	A. I worked with -- let me see. I don't	13:41
12	remember.	13:41
13	Q. Okay. Let's look at the "Strategic Apps"	13:41
14	folder. Now, if we look at this folder and we go up	13:41
15	to the top, it has an "Application Name," do you see	13:41
16	that? So, for example, "Trip Advisor."	13:41
17	A. Yes.	13:42
18	Q. And then there is an "app ID"; right?	13:42
19	A. Yes.	13:42
20	Q. And is that an ID maintained by Facebook	13:42
21	that identifies Trip Advisor?	13:42
22	A. It's their application ID that's created	13:42
23	when they set up an application via the developer	13:42
24	Facebook platform.	13:42
25	Q. So that's like a number that's associated	13:42

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1	with a partner that is Trip Advisor?	13:42
2	A. It's an identification.	13:42
3	Q. Okay. And the next column says "MAUs." Do	13:42
4	you know what MAUs are?	13:42
5	A. Monthly active users.	13:42
6	Q. Okay. And the next column says	13:42
7	"Permissions." Do you know what permissions are?	13:42
8	A. Yes.	13:42
9	Q. Okay. What are permissions?	13:42
10	A. Permissions are permissions that they have	13:42
11	access to.	13:42
12	Q. When you say "have access to," those are	13:42
13	APIs that they have access to; is that right?	13:42
14	A. So, again, I don't know the technical	13:43
15	specificity where I can make that association. But	13:43
16	my general understanding is a permission that's	13:43
17	associated with what they've submitted to the	13:43
18	developer platform they've been granted access to,	13:43
19	so that they can request that permission from users	13:43
20	in their application experience.	13:43
21	Q. Okay. So staying with Trip Advisor, the	13:43
22	first permission is "friends_checkins." You know	13:43
23	what --	13:43
24	A. Sorry, I can't -- oh, wait. I will look at	13:43
25	yours. Sorry.	13:43

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1	Q. You see the Permissions, the first one is	13:43
2	"friends_checkins"? Like, do you have an	13:43
3	understanding what information that would provide	13:43
4	about Facebook users to Trip Advisor?	13:43
5	A. I don't remember.	13:43
6	Q. What about "friends videos"? What do you	13:43
7	think that tells Trip Advisor about Facebook users?	13:44
8	A. So, again, I don't remember the, like,	13:44
9	specificity of each permission.	13:44
10	Q. Can you hazard any kind of an educated	13:44
11	answer as to what friends_videos would provide	13:44
12	access to?	13:44
13	A. I don't feel --	13:44
14	MR. FALCONER: Objection.	13:44
15	THE WITNESS: Sorry. I don't feel	13:44
16	comfortable just because I don't know the technical	13:44
17	specifics.	13:44
18	BY MR. LOESER:	13:44
19	Q. Something about videos?	13:44
20	A. Again, I don't want to assume that.	13:44
21	MR. LOESER: Okay. We can leave this	13:44
22	document, as fascinating as it is.	13:44
23	If we can go back to Exhibit 7, which is	13:44
24	your August 21st, 2013 email.	13:44
25	/ / /	13:44

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1	BY MR. LOESER:	13:44
2	Q. And if you go to the end of the email string	13:44
3	where the -- the email that you wrote, that lays out	13:44
4	the framework, I have a few questions about that.	13:44
5	First of all, you say at the beginning of	13:44
6	your email, "We're working in parallel to parse out	13:45
7	key partnerships/scenarios that we should be solving	13:45
8	for," and then there is -- there's a link there.	13:45
9	Can you tell me what that link is?	13:45
10	MR. FALCONER: Objection. Form.	13:45
11	Go ahead, Jackie.	13:45
12	THE WITNESS: I don't know specifically.	13:45
13	BY MR. LOESER:	13:45
14	Q. And I gather in this email in native, if you	13:45
15	clicked on that hyperlink, it would take you to a	13:45
16	document? Is that how that works?	13:45
17	A. Yes, that's my understanding.	13:45
18	MR. LOESER: Counsel, I don't believe we	13:45
19	have received this document, so please make sure	13:45
20	it's been produced.	13:45
21	MR. FALCONER: We'll -- yeah. We'll look	13:45
22	into it.	13:45
23	MR. LOESER: Well, I'm asking you to do a	13:45
24	little more than look into it. If you can please	13:45
25	make sure it's produced, I would appreciate it.	13:45

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1	MR. FALCONER: Yeah. I mean, I'm not going	13:46
2	to make that commitment to you, but like I said,	13:46
3	I'll look into it.	13:46
4	BY MR. LOESER:	13:46
5	Q. And, Miss Chang, do you have any	13:46
6	recollection of what that hyperlink is for or what	13:46
7	it contains?	13:46
8	A. No, I don't remember.	13:46
9	Q. Now, again focusing on the email that you	13:46
10	wrote and you said that you couldn't remember much	13:46
11	about it. Is it fair to say that when you write an	13:46
12	email, including this email, you intend to portray	13:46
13	accurate information in your email?	13:46
14	A. I'm not sure I understand.	13:46
15	Q. Is it your practice to send email that	13:46
16	includes false information?	13:46
17	A. I -- I don't know. I don't really	13:46
18	understand that question.	13:46
19	Q. Is it your general practice when you're	13:46
20	communicating with your colleagues to send them an	13:46
21	email that contains false information?	13:46
22	A. I -- I don't know. I -- I usually don't	13:47
23	have that intention.	13:47
24	Q. And so when you wrote this email, is it fair	13:47
25	to assume that you were endeavoring to communicate	13:47

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1	accurate information?	13:47
2	MR. FALCONER: Objection. Form.	13:47
3	THE WITNESS: So, again, I don't -- like I	13:47
4	don't remember this. I don't want to assume like --	13:47
5	yeah, I don't want to assume anything.	13:47
6	BY MR. LOESER:	13:47
7	Q. I'm not asking you if you remember this	13:47
8	email. I'm asking you if -- you sent this email;	13:47
9	right?	13:47
10	A. That's what it says.	13:47
11	Q. And it was your general practice when	13:47
12	sending email to communicate accurate information;	13:47
13	right?	13:47
14	A. Yes.	13:47
15	Q. And it was not your general practice to	13:47
16	communicate information that you knew to be false;	13:47
17	right?	13:47
18	A. Again, I feel like that's -- I don't know.	13:47
19	Like I don't know what the information is, so my	13:47
20	intent generally is not -- I don't know the	13:47
21	information itself.	13:48
22	Q. Right. I'm not asking you if the	13:48
23	information is or isn't false. I'm asking you if it	13:48
24	is your intent to generally communicate accurate	13:48
25	information in your --	13:48

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1	A. It is my intent to, yes, provide	13:48
2	information.	13:48
3	Q. And you testified you couldn't recall most	13:48
4	of what we talked about with regard to this email.	13:48
5	Is there something else that you can think	13:48
6	of that would refresh your recollection regarding	13:48
7	the events discussed in this email?	13:48
8	A. Not that I know of.	13:48
9	Q. And so would you agree that this email is	13:48
10	the best evidence, that you're aware of, of what you	13:48
11	knew and were thinking at the time regarding these	13:48
12	topics?	13:48
13	MR. FALCONER: Objection. Form and	13:48
14	foundation.	13:48
15	THE WITNESS: So, again, I can't make that	13:48
16	assumption.	13:48
17	BY MR. LOESER:	13:48
18	Q. You can't make the assumption that this	13:48
19	email is the best evidence of what you were thinking	13:48
20	at the time you wrote the email?	13:48
21	A. Correct. I don't know.	13:49
22	Q. But you can't remember -- you can't identify	13:49
23	anything else that would be a more accurate	13:49
24	reflection of what you were thinking at the time you	13:49
25	wrote this email?	13:49

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1	A. Correct. I don't -- I don't know, so I	13:49
2	don't know what the expanse is.	13:49
3	Q. Is it fair to say that if this email doesn't	13:49
4	refresh your recollection of the events at the time,	13:49
5	you're not aware of anything else that would?	13:49
6	A. I don't -- I don't know.	13:49
7	Q. You don't know if there is any other	13:49
8	evidence that would refresh your recollection?	13:49
9	A. That question would assume I would know,	13:49
10	which I don't know.	13:49
11	Q. But I'm asking you, do you know of any other	13:49
12	evidence that would refresh your recollection?	13:49
13	A. I don't know.	13:49
14	Q. You don't know if there is any other	13:49
15	evidence that would refresh your recollection?	13:49
16	A. Again, I don't know what I don't know, so I	13:49
17	can't make that assumption that I would know.	13:49
18	Q. And if there were something else that might	13:50
19	refresh your recollection, what might that be?	13:50
20	MR. FALCONER: Objection. Asked and	13:50
21	answered. Lack of foundation.	13:50
22	BY MR. LOESER:	13:50
23	Q. You didn't -- there's not like a recorded	13:50
24	transcripts of communications that you had, as far	13:50
25	as you know, is there?	13:50

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1	A. I don't -- to my knowledge, I don't think	13:50
2	so.	13:50
3	Q. Is it fair to say that if someone wanted to	13:50
4	figure out what you were thinking about these topics	13:50
5	at the time of this email, this email would be a	13:50
6	good guide for what you were thinking?	13:50
7	MR. FALCONER: Objection. Form and	13:50
8	foundation.	13:50
9	THE WITNESS: Again, I can't speculate on	13:50
10	that.	13:50
11	BY MR. LOESER:	13:50
12	Q. I'm not asking you to speculate on anything.	13:50
13	I'm just asking you if you think this email would be	13:50
14	a good guide of what you were thinking about the	13:50
15	topics discussed in the email --	13:50
16	A. Well, that would require me to speculate.	13:51
17	Q. What would it require you to speculate at?	13:51
18	A. You're asking me if I know if this is the	13:51
19	best, which would assume I know what everything is	13:51
20	and I don't know what everything is, so I don't	13:51
21	know. So I can't make that assumption.	13:51
22	Q. Let me be specific. Would you agree that	13:51
23	this email is a good guide of what you were thinking	13:51
24	about the topics discussed in the email at the time	13:51
25	you sent the email?	13:51

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1	MR. FALCONER: Objection. Form. Foundation	13:51
2	and asked and answered.	13:51
3	THE WITNESS: Again, when you say "good," I	13:51
4	don't know where I could like -- where I could say I	13:51
5	know what a definition of good means.	13:51
6	BY MR. LOESER:	13:51
7	Q. I will try one more time. Would you agree	13:51
8	that the email that you wrote is evidence of what	13:51
9	you were thinking about the subjects discussed in	13:51
10	your email at the time you sent the email?	13:52
11	MR. FALCONER: Objection. Excuse me.	13:52
12	Objection. Form.	13:52
13	THE WITNESS: Again, I don't remember. I	13:52
14	know the email is there, so I don't want to	13:52
15	speculate what I was thinking because I don't know.	13:52
16	BY MR. LOESER:	13:52
17	Q. Do you ever go back and read your old emails	13:52
18	to try and understand what you were thinking at some	13:52
19	earlier time?	13:52
20	A. Generally, no. I have a lot of emails.	13:52
21	Q. Have you ever done that?	13:52
22	A. Have I ever looked at an email?	13:52
23	Q. Have you ever gone back and looked at an	13:52
24	email you wrote earlier to refresh your recollection	13:52
25	about what you were thinking at the time on a	13:52

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1	subject?	13:52
2	A. I have done that.	13:52
3	Q. And when you've done that, have you found	13:52
4	that you're able to refresh your recollection about	13:53
5	something you were thinking by reading your old	13:53
6	email?	13:53
7	A. That depends. It depends on whether that	13:53
8	situation was relevant to me at the time. So if	13:53
9	it's tied to this specific scenario, again, I was	13:53
10	working on a lot of different things, so I don't	13:53
11	remember this specific -- and I don't know if that	13:53
12	would be relevant for that specific type of example.	13:53
13	Q. So I looked through your communication here	13:53
14	to folks, Chris Daniels, KP, Ime Archibong. I don't	13:53
15	see any reference here -- there is nothing in this	13:53
16	string that tells them not to rely on the	13:53
17	information that you wrote because you were	13:53
18	transitioning to another job; is that right?	13:53
19	A. I don't think I understand.	13:53
20	Q. Do you need the question read back?	13:53
21	A. Well, I can tell you, I don't understand the	13:54
22	intent of the question.	13:54
23	Q. How about just answer the question.	13:54
24	A. I don't know.	13:54
25	Q. You don't know if you said somewhere in this	13:54

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1	email to your colleagues not to rely on the	13:54
2	information that you provided in the email?	13:54
3	Wouldn't that be -- if you had said that, wouldn't	13:54
4	that be like visible on the page we are looking at?	13:54
5	A. So I didn't write that, but I don't know	13:54
6	what the intent of the question is. I don't think I	13:54
7	write emails with caveats in mind.	13:54
8	Q. The question is really simple. Did you tell	13:54
9	your colleagues when you sent them this email, did	13:54
10	you write in the email, "Don't rely on the	13:54
11	information I'm providing because I'm transitioning	13:54
12	to the job"? It is a yes-or-no question.	13:54
13	A. I didn't write that specifically as -- as	13:54
14	it's in the document.	13:54
15	MR. FALCONER: Sorry, I think my audio is	13:54
16	out. I had an objection to that last question as	13:55
17	argumentative.	13:55
18	MR. LOESER: We can go to Exhibit 9. I will	13:55
19	have this document marked as Exhibit 9. This is an	13:55
20	email from Brendan Moore to you, dated April 24th,	13:55
21	2013.	13:55
22	MR. FALCONER: Derek, I apologize. I'm	13:55
23	having a hard time hearing you. Is there any way	13:55
24	you can turn up your audio or move closer to the mic	13:55
25	or anything?	13:55

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1	MR. LOESER: Let me try and change -- is	13:55
2	that any clearer?	13:55
3	MR. FALCONER: Yeah. That's a little	13:55
4	better. Thank you.	13:55
5	(Exhibit 9 marked for identification.)	13:55
6	BY MR. LOESER:	13:55
7	Q. Miss Chang, you are looking at an email from	13:55
8	Brendan Moore to, it looks like, himself and also to	13:56
9	you, dated April 24th, 2013. Subject, "Message	13:56
10	Summary" with a long number.	13:56
11	Do you see that?	13:56
12	A. Yes.	13:56
13	Q. Who is Brendan Moore?	13:56
14	A. He was a colleague of mine.	13:56
15	Q. Okay. Do you know what his job was at the	13:56
16	time?	13:56
17	A. He was a data analyst. I don't know if he	13:56
18	was an intern or full time at the time.	13:56
19	Q. And this email, it looks like it forwards a	13:56
20	chat; is that -- is that right?	13:56
21	A. It looks to be. I'm not sure.	13:56
22	Q. Okay. And it appears that you had -- you	13:56
23	were communicating with Mr. Moore via chat and that	13:56
24	he sent that communication to himself and to you; is	13:56
25	that right?	13:56

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1	MR. FALCONER: Objection. Foundation.	13:56
2	THE WITNESS: I don't know what his intent	13:57
3	was. I don't know if that was true or not.	13:57
4	BY MR. LOESER:	13:57
5	Q. Well, I'm not asking about his intent. I'm	13:57
6	just looking at the document and trying to	13:57
7	understand what it is. Does it appear to reproduce	13:57
8	a chat that you had with Mr. Moore?	13:57
9	A. I don't know.	13:57
10	Q. Okay.	13:57
11	MR. FALCONER: Derek, can I -- if I	13:57
12	represent that this is just how chats get produced	13:57
13	in discovery, does that help? Is that helpful?	13:57
14	MR. LOESER: That is. Thank you.	13:57
15	BY MR. LOESER:	13:57
16	Q. If you look at the first line of the chat,	13:57
17	it's from you and it says:	13:57
18	"Question - so for the ACU dashboard -	13:57
19	I noticed a lot of partner app IDs not	13:57
20	showing up."	13:57
21	Do you recall what the ACU dashboard was?	13:57
22	A. No, I don't.	13:57
23	Q. And you don't have any recollection of the	13:57
24	problem of partner IDs not showing up on the ACU	13:57
25	dashboard?	13:57

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1	A. No.	13:57
2	Q. If we page down the chat, there's a line in	13:57
3	which you say:	13:58
4	"None of these app IDs show up."	13:58
5	That's on the second page, about the middle	13:58
6	of the page. Actually, I think it is the third	13:58
7	page. Third page. I'm sorry. There it is.	13:58
8	Do you see that?	13:58
9	A. Yes.	13:58
10	Q. And do you recall anything about this	13:58
11	conversation about these particular apps not showing	13:58
12	up?	13:58
13	A. I don't recall this.	13:58
14	Q. And if you look down, right below your	13:58
15	identification of the apps that don't show up,	13:58
16	Mr. Moore says:	13:59
17	"Some of those are in the GK."	13:59
18	Do you recall what the "GK" was?	13:59
19	A. I know what GK is generally, but I don't	13:59
20	know which one he's referring to.	13:59
21	Q. Okay. What is GK generally?	13:59
22	A. A gatekeeper.	13:59
23	Q. Okay. And what is that?	13:59
24	A. I don't know the technicals behind that, so	13:59
25	I'm sure I'm explaining incorrectly, but from what I	13:59

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1	understand, it's some sort of permissioning --	13:59
2	permissioning system.	13:59
3	Q. Permissioning for partners to get access to	13:59
4	permissions; is that right?	13:59
5	A. Again, I don't know where I can make that	13:59
6	assertion. It's more technical than I'm familiar	13:59
7	with.	13:59
8	Q. Okay. And right after he says, "Some of	13:59
9	those are in the GK," Mr. Moore says, "The rest	13:59
10	don't technically count towards our completeness	13:59
11	metric."	14:00
12	Do you know what the "completeness metric"	14:00
13	is?	14:00
14	A. No.	14:00
15	Q. Okay. Paging down a little further,	14:00
16	Mr. Moore says:	14:00
17	"My personal belief is that unless	14:00
18	the app is contributing towards a	14:00
19	valuable vertical, they shouldn't	14:00
20	count."	14:00
21	Do you know what a "valuable vertical"	14:00
22	refers to?	14:00
23	A. No.	14:00
24	Q. No idea? That is not a term you ever used?	14:00
25	No understanding of it whatsoever?	14:00

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```
1        A.    I just don't remember.                   14:00

2        Q.    Do you know what a "vertical" is?        14:00

3        A.    A vertical, I think it depends on what   14:00

4    context it's being used.                           14:00

5        Q.    Well, here it's being used in the context of  14:00

6    apps.  So do you know what it means in that context?  14:00

7        A.    Again, I don't remember.                 14:00

8        Q.    Just no idea at all; is that what you are  14:00

9    saying?                                            14:00

10       A.    Correct.                                 14:00

11             MR. FALCONER:  Objection.  Asked and     14:00

12   answered.                                          14:00

13   BY MR. LOESER:                                     14:00

14       Q.    Okay.  And then you respond:             14:00

15             "We don't support a lot of valuable      14:01

16             verticals today like commerce."          14:01

17             So do you know what you were talking about  14:01

18   there?                                             14:01

19       A.    Again, I don't remember.                 14:01

20       Q.    On the next page, you say:               14:01

21             "From developer and platform growth,     14:01

22             on our end there are a lot of valuable   14:01

23             partnerships out there."                 14:01

24             What did you mean by "valuable           14:01

25   partnerships"?  Let me help you with that.  Your   14:01
```

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1	next line says "that are contributing a lot of good	14:01
2	info."	14:01
3	So what do you mean by "valuable	14:01
4	partnerships that are contributing a lot of good	14:01
5	info."	14:01
6	A. Sorry. I hear some background sounds.	14:01
7	So, again, I don't know.	14:02
8	Q. Okay. What do you think you meant by	14:02
9	"partnerships that contribute a lot of good info"?	14:02
10	You worked with a lot of partners over a long period	14:02
11	of time. Do you have any understanding of what it	14:02
12	is for a partnership -- for a partner to contribute	14:02
13	a lot of good info?	14:02
14	A. So, again, I don't remember, so I don't	14:02
15	really -- I can't really guess.	14:02
16	Q. So if someone said to you today, "Jackie,	14:02
17	this partner is contributing a lot of good info,"	14:02
18	would you have any idea what they meant?	14:02
19	A. Probably not.	14:02
20	Q. If you turn to the next page of the chat, in	14:02
21	the middle, Mr. Moore writes:	14:02
22	"We don't want the tail to wag the dog.	14:02
23	The first priority is gaining valuable	14:02
24	data on users. The second priority is	14:02
25	pretty boxes."	14:02

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1   Did you agree that the first priority for   14:02

2   Facebook was gaining valuable data on users?   14:03

3   A.   So, again, I don't really remember this   14:03

4   conversation, so I don't really recall this.   14:03

5   Q.   Let's keep going. Right below that you say: 14:03

6   "To be honest -- I don't think music   14:03

7   is valuable data. No one has found   14:03

8   use for it on the advertising side."   14:03

9   So what were you saying there?   14:03

10   A.   Again, I can't really speculate because I   14:03

11   don't remember.   14:03

12   Q.   Do you think that music is valuable data for 14:03

13   Facebook?   14:03

14   A.   Again, I don't remember the context. I   14:03

15   don't know.   14:03

16   Q.   And you say: 14:03

17   "It's not even good targeting metrics."   14:03

18   So did you know what those words meant?   14:03

19   A.   Again, I don't remember, so I don't -- I   14:03

20   can't really assume.   14:03

21   Q.   So let's just look at this conversation   14:04

22   though and think for a minute. When you wrote these 14:04

23   words "to be honest -- I don't think music is   14:04

24   valuable data. No one has found use for it on the   14:04

25   advertising side," you are telling the jury that you 14:04

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1   have utterly no understanding of what you meant by   14:04

2   that?   14:04

3   MR. FALCONER: Objection. Form and asked   14:04

4   and answered.   14:04

5   THE WITNESS: So I don't remember this chat   14:04

6   specifically.   14:04

7   BY MR. LOESER: 14:04

8   Q.   I'm not asking you if you remember this chat   14:04

9   specifically. Do you need me to read the question   14:04

10   back?   14:04

11   A.   Yes.   14:04

12   MR. LOESER: Miss Jennings, would you please   14:04

13   read that question back.   14:04

14   (Record read as follows: 14:04

15   "Q. So let's just look at this   14:04

16   conversation though and think for a   14:04

17   minute. When you wrote these words 'to be   14:04

18   honest, I don't think music is valuable   14:04

19   data. No one has found use for it on the   14:04

20   advertising side,' you are telling the   14:04

21   jury that you have utterly no   14:04

22   understanding what you meant by that?")   14:04

23   MR. FALCONER: Same objections.   14:05

24   THE WITNESS: Yes. Because I don't   14:05

25   remember.   14:05

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```
 1   BY MR. LOESER:                                    14:05

 2      Q.   Go down a little further in your chat.  You  14:05

 3   say:                                              14:05

 4           "Well, I think music falls into           14:05

 5           Facebook goal #1:  Keeping users          14:05

 6           engaged on Facebook.  But it doesn't      14:05

 7           help with #2:  Get monetizable data.      14:05

 8           Sorry for my rant."                       14:05

 9           So, Miss Chang, what did you mean by      14:05

10   Facebook "Goal #1, keeping users engaged on       14:05

11   Facebook"?                                        14:05

12      A.   So, again, I don't remember.              14:05

13      Q.   And as you sit here today, you have utterly 14:05

14   no understanding of what it would mean to keep users 14:05

15   engaged on Facebook?                              14:05

16      A.   Not in this context of this message.      14:05

17      Q.   Do you have any understanding of it in any 14:05

18   context?                                          14:05

19      A.   Well, keeping users engaged in terms of what 14:05

20   it actually says directly in there, I know what that 14:06

21   means, but I don't know it in the context of this 14:06

22   message.                                          14:06

23      Q.   What does that mean?                       14:06

24      A.   It means I don't remember this conversation. 14:06

25      Q.   I know, but you said you didn't understand 14:06
```

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1	it in this context. But what does it mean to you	14:06
2	right now, as you sit here today, to keep users	14:06
3	engaged on Facebook?	14:06
4	A. It means -- it means the same exact thing as	14:06
5	it says, which is to keep them engaged on Facebook.	14:06
6	Q. What does "engaged" mean?	14:06
7	A. Interacting.	14:06
8	Q. Okay. So to keep users on the platform; is	14:06
9	that right?	14:06
10	A. Not necessarily. To me, it means like	14:06
11	interacting.	14:06
12	Q. Interacting with Facebook?	14:06
13	A. Interacting with each other.	14:06
14	Q. On Facebook?	14:06
15	A. On Facebook.	14:06
16	Q. Okay. And when you say, "Get monetizable	14:06
17	data," what does that mean to you? What does it	14:06
18	mean to "get monetizable data"?	14:06
19	A. I don't remember.	14:06
20	Q. Well, you still work at Facebook. So as you	14:07
21	sit here today right now, what does "get monetizable	14:07
22	data" mean to you?	14:07
23	A. It doesn't mean a lot because I don't work	14:07
24	on -- I don't work on ads, and I don't work on the	14:07
25	platform.	14:07

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1	Q. So are you telling the jury that the phrase	14:07
2	"get monetizable data" has utterly no meaning to you	14:07
3	now?	14:07
4	A. Yes.	14:07
5	MR. FALCONER: Objection. Asked and	14:07
6	answered and argumentative.	14:07
7	BY MR. LOESER:	14:07
8	Q. Which part of it, is it the "monetizable" or	14:07
9	the "data" that has no meaning to you?	14:07
10	A. Both. I just don't remember this	14:07
11	conversation, so I don't know what the context of it	14:07
12	is.	14:07
13	Q. Right. I'm not asking about the	14:07
14	conversation. I'm asking you about the words	14:07
15	"monetizable data" and I just want to make sure it's	14:07
16	clear for the jury what you are saying.	14:07
17	You have no understanding whatsoever about	14:07
18	what "monetizable data" means?	14:07
19	MR. FALCONER: Same objections.	14:07
20	THE WITNESS: Correct. In this context, I	14:07
21	don't know what it means.	14:07
22	BY MR. LOESER:	14:08
23	Q. I'm not asking you about this context. I'm	14:08
24	asking you at all. Do you have an understanding of	14:08
25	those terms at all?	14:08

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1	A. I think --	14:08
2	MR. FALCONER: Same objection.	14:08
3	THE WITNESS: I think it depends.	14:08
4	BY MR. LOESER:	14:08
5	Q. Okay. What does it depend on?	14:08
6	A. I think it depends on -- I don't know -- the	14:08
7	interpretation of it.	14:08
8	Q. Okay. What's your interpretation of it? If	14:08
9	someone were to say to you today, "Miss Chang, can	14:08
10	you tell me what monetizable data is for Facebook?"	14:08
11	How would you answer that question?	14:08
12	A. I honestly don't know. I don't work on this	14:08
13	anymore, so I don't know what monetizable data is at	14:08
14	this point.	14:08
15	Q. Okay. Is this something that you perhaps	14:08
16	knew when you wrote this chat?	14:08
17	A. I -- I can't speculate on that.	14:08
18	Q. So would you have used the terms	14:08
19	"monetizable data" if you didn't know what they	14:08
20	meant?	14:08
21	A. I'm not sure I understand.	14:08
22	Q. Well, you wrote it. So I'm wondering if	14:08
23	when you wrote it, is that your practice to use	14:09
24	terms you have no understanding of when you write to	14:09
25	people?	14:09

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1	A. So, again, I don't remember this	14:09
2	conversation so I don't -- I don't know in that	14:09
3	context.	14:09
4	Q. I'm not asking you about it in this context.	14:09
5	I'm trying to understand how you communicate to	14:09
6	people.	14:09
7	You used the term "monetizable data." You	14:09
8	don't remember what it means now, but is it fair to	14:09
9	say you knew what it meant when you wrote this chat?	14:09
10	MR. FALCONER: Objection. Foundation.	14:09
11	THE WITNESS: Again, I don't know.	14:09
12	BY MR. LOESER:	14:09
13	Q. What don't you know?	14:09
14	A. I don't know what your question means.	14:09
15	Q. Really?	14:09
16	A. Yes.	14:09
17	Q. My question is if you understand -- when you	14:09
18	wrote the words "monetizable data" if you understood	14:09
19	what that meant when you wrote it?	14:09
20	MR. FALCONER: Objection. Asked and	14:09
21	answered.	14:09
22	THE WITNESS: So I don't know what the state	14:10
23	of my mind was at that time, so I can't speculate	14:10
24	that.	14:10
25	/ / /	14:10

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1	BY MR. LOESER:	14:10
2	Q. But it's fair to say it was not your general	14:10
3	practice to use words that you didn't understand;	14:10
4	right?	14:10
5	A. I don't -- again, I don't -- I don't know	14:10
6	what you mean by that.	14:10
7	Q. It might have been your general practice to	14:10
8	use words you don't understand?	14:10
9	A. I think it's possible to use words I don't	14:10
10	fully understand, yes.	14:10
11	Q. Do you recall ever talking to any of your	14:10
12	other colleagues ever about what monetizable data	14:10
13	means to Facebook?	14:10
14	A. I don't remember.	14:10
15	MR. LOESER: The next exhibit is Exhibit 10.	14:11
16	(Exhibit 10 marked for identification.)	14:11
17	BY MR. LOESER:	14:11
18	Q. For the record, Exhibit 10 is an email from	14:11
19	KP to Miss Chang, dated August 23rd, 2013, Subject	14:11
20	line, "Re: T0/Special Cases for P3 Consideration."	14:11
21	And looking at the subject line, which is	14:12
22	one we've seen before, can you explain what	14:12
23	"T0/Special Cases for P3 consideration" means?	14:12
24	A. I think, like I said before, I mean, it	14:12
25	means like T0, top priority.	14:12

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1   Q.   And the reference to "special cases," take a   14:12

2   minute to look at the email string. It might help   14:12

3   you answer the questions if you haven't already.   14:12

4   A.   Okay. Okay.   14:12

5   Q.   Okay. Now, as we -- as I mentioned a moment   14:14

6   ago, this is an email from KP to you that starts an   14:14

7   email string. And the subject is the same as the   14:14

8   subject of the earlier August 21st email that we   14:14

9   talked about.   14:14

10   And if you go down to the email at the   14:14

11   bottom of the first page, or midway through the   14:14

12   first page, it's an email from you to Chris Daniels,   14:14

13   Ime Archibong and KP, with a CC to Simon Cross,   14:14

14   dated August 22nd, 2013. Do you see that?   14:14

15   A.   Yes.   14:14

16   Q.   And it has that same subject, "T0/Special   14:14

17   Cases for P3 consideration"; right?   14:14

18   A.   Yes.   14:14

19   Q.   And if you look at the second paragraph --   14:15

20   let's look at the first paragraph. You write: 14:15

21   "I don't think we should approach any   14:15

22   partnership/sales team yet until we   14:15

23   are in agreement with Product (Vernal/   14:15

24   Constantin) and PMM on an appropriate   14:15

25   communication plan (as it'll just   14:15

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1	create unnecessary anxiety). For	14:15
2	tomorrow's meeting, I promised	14:15
3	Constantin that I'd provide him a	14:15
4	recommendation for our team - if you	14:15
5	don't see any issues, I'm going to	14:15
6	give him our top-level doc."	14:15
7	Do you see that?	14:15
8	A. Yes.	14:15
9	Q. So this shows, again, your involvement in	
10	this subject of important cases for P3	
11	consideration; right?	
12	A. It appears so, yes.	14:15
13	Q. Okay. And if you look down your email a	14:15
14	little further, you say:	14:15
15	"For this meeting, I'd like to ensure	14:15
16	a couple things are accomplished."	14:15
17	Could you read your first paragraph there,	14:16
18	No. 1?	14:16
19	A. "Immediate feedback re: Sales and	14:16
20	Platform partners planning to launch	14:16
21	integrations (i.e., Royal Bank,	14:16
22	NetFlix, Starbucks). I need to	14:16
23	provide feedback for RB and Starbucks	14:16
24	by Monday and how they should move	14:16
25	forward.	14:16

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1	"RB and NetFlix were approved for	14:16
2	Titan API - it seems our general	14:16
3	recommendation will be for these	
4	partners to proceed; however, it	
5	would be good to understand our	
6	long-term rationale strategy in	
7	handling these partners. Starbucks	14:16
8	is an interesting case, where our	14:16
9	sales team sold them an integration	14:16
10	reliant on friend data and are	14:16
11	getting close to launch."	14:16
12	Q. Okay. So you are discussing particular	14:16
13	partners and that -- fair to say that these are	14:16
14	referred to as important special cases for P3	14:16
15	consideration?	14:16
16	A. Again, I don't remember, so I don't know if	14:16
17	these are specifically special cases.	14:16
18	Q. Okay. But that's the subject of the email	14:16
19	and that's the information that's below that	14:16
20	subject; right?	14:16
21	A. That is the subject, but I don't know if	14:16
22	that's still the context.	14:17
23	Q. Okay. And when you say, "RB and NetFlix	14:17
24	were approved for Titan API," what was "Titan API"?	14:17
25	A. I don't remember.	14:17

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1	Q. Utterly no recollection whatsoever what	14:17
2	"Titan API" was?	14:17
3	A. Correct.	14:17
4	Q. And when you say, "Starbucks is an	14:17
5	interesting case where our sales team sold them an	14:17
6	integration reliant on friend data and are getting	14:17
7	close to launch," does that mean that when the sales	14:17
8	team worked up the partnership with Starbucks, the	14:17
9	information that Starbucks was going to obtain in	14:17
10	that partnership included friends data?	14:17
11	A. Again, I don't remember, so I don't know	14:17
12	specifically if it's the intent you laid out.	14:17
13	Q. Is that what those words mean to you that I	14:17
14	just read on the page? Do you want me to read --	14:17
15	A. No.	14:18
16	Q. I will read it again. You tell me if that's	14:18
17	what those words seem to mean to you, words that you	14:18
18	wrote.	14:18
19	"Starbucks is an interesting case	14:18
20	where our sales team sold them on an	14:18
21	integration reliant on friend data	14:18
22	and are getting close to launch."	14:18
23	What do those words mean to you right now	14:18
24	when you read them?	14:18
25	A. It means what it says. That "Starbucks is	14:18

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1	an interesting case where our sales team sold them	14:18
2	on an integration reliant on friend data and are	14:18
3	getting close to launch."	14:18
4	Q. So that perhaps made it problematic to stop	14:18
5	letting them access friend data; right?	14:18
6	A. So I don't remember, so I don't -- I can't	14:18
7	draw that conclusion. I don't know.	14:18
8	Q. Can you read No. 2 item in your email.	14:18
9	A. "2/General approach on exceptions or	14:18
10	wind-down for these major categories:	14:19
11	"T0 Partnerships.	14:19
12	"Device/Hardware - Strategic (i.e.	14:19
13	Feature phones).	14:19
14	"Device/Hardware - Non-Strategic	14:19
15	(i.e. Social TV).	14:19
16	"Web/Mobile Apps - Strategic (i.e.	14:19
17	Titan Partners).	14:19
18	"Web/Mobile Apps - Non-Strategic	14:19
19	(i.e. Gifting, Aggregators, etc.)"	14:19
20	Q. You can stop there.	14:19
21	And you indicate that you need to determine	14:19
22	a general approach on exceptions for these major	14:19
23	categories. And those categories that you just	14:19
24	read, those are the major categories that you were	14:19
25	referring to?	14:19

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```
 1        A.   So, again, I don't remember, so I don't know   14:19

 2   if that's -- if that's all categories or whatever       14:19

 3   it's saying.                                             14:20

 4        Q.   And what did you mean by "exceptions"?         14:20

 5        A.   I don't remember the context of it, so I       14:20

 6   don't -- I don't know.                                   14:20

 7        Q.   And can you explain the difference between     14:20

 8   "strategic" and "non-strategic" as that's used in        14:20

 9   the -- when you describe different categories?           14:20

10        A.   No, I don't remember.                          14:20

11        Q.   And as you sit here today, as someone still    14:20

12   working for Facebook, can you explain the difference     14:20

13   between strategic and non-strategic partners?            14:20

14        A.   So I think it would depend on the context in   14:20

15   terms of how we're working with them.                    14:20

16        Q.   So what would it mean in the context of        14:20

17   considering exceptions to the elimination of friends     14:20

18   permissions?                                             14:20

19            MR. FALCONER:   Objection.  Asked and           14:20

20   answered.                                                14:20

21            THE WITNESS:   So, again, I don't remember,     14:20

22   so I don't -- I can't speculate on that.                 14:21

23   BY MR. LOESER:                                           14:21

24        Q.   And, then, next in your email you say:         14:21

25            "We should also ensure that we actively         14:21
```

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1	collaborate with Product & PMM..."	14:21
2	What is "Product and PMM"?	14:21
3	A. Product managers and PMM, partner marketing	14:21
4	managers.	14:21
5	Q. Okay. So looking at the beginning of your	14:21
6	email, you communicate to your -- the recipients of	14:21
7	this email that you would like to "ensure a couple	14:21
8	things are accomplished"; is that right?	14:21
9	A. For the meeting.	14:21
10	Q. Okay.	14:21
11	A. Yeah, for the meeting tomorrow, yeah.	14:21
12	Q. And you were involved enough in this process	14:21
13	to communicate to your colleagues what you would	14:21
14	like to see accomplished; is that right?	14:21
15	A. Well, like I said, it says "for a meeting	14:21
16	tomorrow" and what I want to accomplish for that	14:22
17	meeting.	14:22
18	Q. Okay. And then down below when you say,	14:22
19	"We should also ensure that we actively collaborate	14:22
20	with Product & PMM," is that a recommendation from	14:22
21	you that you want to -- when you say we want to	14:22
22	"ensure that we actively collaborate," is that you	14:22
23	instructing or guiding this group of people on	14:22
24	something that should happen?	14:22
25	A. It sounds like it's a recommendation.	14:22

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1	MR. LOESER: We can put that document aside,	14:22
2	and I will introduce Exhibit 11, which for the	14:22
3	record is an email from Simon Cross to Ime	14:22
4	Archibong, Jackie Chang, and KP, dated September	14:22
5	3rd, 2013, with the subject line "Re: P3.0 Rollout	14:22
6	Plan."	14:23
7	(Exhibit 11 marked for identification.)	14:23
8	BY MR. LOESER:	14:23
9	Q. So, Miss Chang, if you look at this email,	14:23
10	who is Simon Cross?	14:23
11	A. He was a colleague.	14:23
12	Q. Okay. Was he in the same department or do	14:23
13	you recall what his position was?	14:23
14	A. I think he was a partner manager at this	14:23
15	time.	14:23
16	Q. Okay. Does that mean you were reporting to	14:23
17	him or he was reporting to you?	14:23
18	A. I was reporting to Ime and I had no reports.	14:23
19	Q. Okay. And so Simon Cross sends a slide deck	14:23
20	about P3 rollout planning and it goes to, among	14:23
21	other people, yourself; is that right?	14:23
22	A. That's what it looks like.	14:23
23	Q. Okay. And if you look down the page a bit,	14:24
24	it looks like they're planning a meeting for P3	14:24
25	rollout planning and they reschedule it so you can	14:24

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1	make it; is that right?	14:24
2	A. That's what it looks like.	14:24
3	MR. FALCONER: Objection. Foundation.	14:24
4	MR. LOESER: All right. Let's turn to the	14:24
5	attachment, which we will introduce as Exhibit 12.	14:24
6	(Exhibit 12 marked for identification.)	14:24
7	BY MR. LOESER:	14:24
8	Q. And I will represent for the record,	14:24
9	Miss Chang, that Exhibit 12 is the document that was	14:24
10	attached to Mr. Cross' email that went to you, among	14:24
11	others.	14:24
12	And this slide deck is titled, "Platform 3.0	14:24
13	Planning, Preparation & Execution."	14:24
14	Did I read that right?	14:25
15	A. Yes.	14:25
16	Q. And you received this slide deck, as	14:25
17	reflected in the cover email, on September 3rd,	14:25
18	2013; right?	14:25
19	A. If that's what it says in the email.	14:25
20	Q. So if you go to the second page of the slide	14:25
21	deck, after the -- first page after the title page,	14:25
22	and the slide is captioned "2 separate pieces of	14:25
23	work."	14:25
24	Do you see that?	14:25
25	A. Yes.	14:25

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1	Q. And under the heading, "Capabilities	14:25
2	Cleanup," can -- the first bullet says, "Audit	14:25
3	existing private API whitelists," then "who has what	14:25
4	and why?" "GOAL: Cleaner, more equitable, more	14:25
5	supportable Platform."	14:26
6	Do you see that?	14:26
7	A. Yes.	14:26
8	Q. And, Miss Chang, do you recall being	14:26
9	involved in the audit of existing private API	14:26
10	whitelists?	14:26
11	A. No, I don't recall.	14:26
12	Q. And do you recall the effort to figure out	14:26
13	what partners or apps were whitelisted and why?	14:26
14	A. I don't remember.	14:26
15	Q. Do you remember anything at all about any	14:26
16	involvement you had in the subject matter of	14:26
17	whitelists?	14:26
18	A. Sorry. Can you state that question again?	14:26
19	Q. Do you remember being involved in any way in	14:26
20	figuring out what partners were whitelisted and why?	14:26
21	A. Not -- I don't remember.	14:26
22	Q. This slide over on the right side refers to	14:27
23	"Gracefully manage this huge transition. "	14:27
24	Was the rollout to Platform 3.0 a huge	14:27
25	transition?	14:27

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1	A. Again, I don't remember.	14:27
2	Q. Turn to the next slide. The heading is,	14:27
3	"P3.0 Launches/Deprecations."	14:27
4	Do you see that?	14:27
5	A. Yes.	14:27
6	Q. And if you look, there is a table in the	14:27
7	middle for "Public API Deprecations," and it states:	14:27
8	"Currently, public APIs which will	14:28
9	become whitelist only or deprecated	14:28
10	entirely."	14:28
11	Do you see that?	14:28
12	A. Yes.	14:28
13	Q. And do you remember the role you played in	14:28
14	evaluating these different deprecations?	14:28
15	A. No.	14:28
16	MR. FALCONER: Objection. Foundation.	14:28
17	THE WITNESS: No.	14:28
18	BY MR. LOESER:	14:28
19	Q. Okay. We can go to the next slide. Oh,	14:28
20	actually, sorry, go back up to the...	14:28
21	Do you see on here that the deprecations	14:28
22	included "Feed API and read_stream permission"?	14:28
23	A. I see it written there, yes.	14:28
24	Q. Do you see the next deprecation is	14:28
25	"friends_permissions"?	14:28

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1	A. Yes, I see that there.	14:28
2	Q. And do you see that those are -- those two	14:28
3	deprecations are the deprecations of permissions	14:29
4	that are most widely used by apps on this table. Is	14:29
5	that your understanding?	14:29
6	A. So -- yeah, so I don't know the context of	14:29
7	that, so I don't -- I don't know if it really is or	14:29
8	isn't.	14:29
9	Q. Okay. But you see that for "Feed API and	14:29
10	read_stream," it says, "Number of apps requesting	14:29
11	these permissions per day," and it says, "7,003"?	14:29
12	A. Yes, I see that.	14:29
13	Q. And do you see under "friends_permissions,"	14:29
14	it says, "Number of apps requesting these	14:29
15	permissions today," it says "18,067"?	14:29
16	A. Yes, I see that.	14:29
17	Q. Okay. Go to the next slide.	14:29
18	Now, Miss Chang, you were involved in	14:29
19	preparing for the deprecations of these permissions,	14:29
20	were you not?	14:29
21	A. Again, I -- I don't remember.	14:30
22	Q. Okay. If you look at the first bullet, it	14:30
23	says:	14:30
24	"Pre-enforce use existing policies to	14:30
25	revoke app access (note: No appetite	14:30

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1		to do this at present)."	14:30
2		Do you recall there being no appetite to use	14:30
3		existing policies to revoke app access?	14:30
4	A.	Again, I don't remember this.	14:30
5	Q.	Okay. And you look at the next one:	14:30
6		"Standard Apps are notified on P-day	14:30
7		and have n-days to comply (vast	14:30
8		majority of apps)."	14:30
9		Do you recall what that refers to?	14:30
10	A.	No.	14:30
11	Q.	This next bullet item is:	14:30
12		"Extension Apps given n+x days to	14:30
13		comply due to long upgrade cycles -	14:30
14		e.g., devices (SmartTV, in-car,	14:30
15		mobile OS's)."	14:30
16		Do you have an understanding of what	14:30
17		"extensions" are?	14:30
18	A.	I know what an extension is, but I don't --	14:30
19		I don't recognize in this context.	14:30
20	Q.	Yeah. You don't recall in any way your	14:30
21		involvement in sorting out whether any partners were	14:30
22		given extensions of the friends permission	14:31
23		deprecation?	14:31
24	A.	I don't remember.	14:31
25	Q.	Okay. And:	14:31

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1	"Exception Apps to be whitelisted	14:31
2	indefinitely due to their strategic	14:31
3	value to Facebook."	14:31
4	That must be something that you remember;	14:31
5	right?	14:31
6	A. I don't remember it.	14:31
7	Q. Okay. You don't recall the role you played	14:31
8	in determining which whitelisted apps -- which apps	14:31
9	should be whitelisted indefinitely due to their	14:31
10	strategic value to Facebook?	14:31
11	A. Correct. I don't remember.	14:31
12	Q. As you sit here today, can you recall the	14:31
13	difference between providing an app with an	14:31
14	extension versus an exception?	14:31
15	A. No, I can't.	14:31
16	Q. Do you think you ever knew what the	14:31
17	difference was?	14:31
18	A. I don't know.	14:31
19	MR. LOESER: We can go to the next exhibit.	14:31
20	(Exhibit 13 marked for identification.)	14:32
21	BY MR. LOESER:	14:32
22	Q. This will be Exhibit 13, which is an	14:32
23	email from Simon Cross to you and others, dated	14:32
24	December 10th, 2013, the subject "Re: Simon's	14:32
25	updates - 6th of December."	14:32

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1		Do you see this document, Miss Chang?	14:32
2	A.	Now, I do. Can I have time to read through	14:32
3	it?		14:33
4	Q.	Sure.	14:33
5	A.	Okay.	14:33
6	Q.	And if you flip through this email string,	14:33
7	you have probably noticed that this is a string that		14:33
8	has a series of updates called "Simon's updates."		14:33
9		Did you see that?	14:33
10	A.	Yes.	14:33
11	Q.	And do you recall that Simon Cross regularly	14:33
12	sent out updates that were dated?		14:33
13	A.	I don't really remember the updates	14:34
14	specifically, but like it says in the email, it		14:34
15	looks like he sends it out regularly.		14:34
16	Q.	Okay. And in the update, he runs through a	14:34
17	series of projects; is that right?		14:34
18	A.	It looks that way, yes.	14:34
19	Q.	Any reason to think that he was sending out	14:34
20	false information?		14:34
21	A.	I'm not sure I know what that means.	14:34
22	Q.	Well, you got these updates and you didn't	14:34
23	read them and go, wow, this is all untrue; right?		14:34
24	There is no email -- you wouldn't have an email back		14:34
25	to Simon saying, stop sending these updates, they		14:34

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1	are all untrue?	14:34
2	A. Well, that would be rude of me, but...	14:34
3	Q. You don't recall doing that?	14:34
4	A. No, but I don't -- I don't really remember	14:34
5	reading through these updates just because we all	14:34
6	had to write updates so I don't really spend time	14:34
7	reading other people's updates.	14:34
8	Q. What did you write updates about?	14:35
9	A. The projects I was working on.	14:35
10	Q. Okay. And so let's look at -- go to the	14:35
11	third page of the email string. There is a heading,	14:35
12	"Platform Simplification."	14:35
13	Do you see that?	14:35
14	A. On page 3?	14:35
15	Q. On page 3. Well, there is a heading	14:35
16	"Platform Simplification" on every single one of the	14:35
17	updates, but there is one for the one dated November	14:35
18	8th, 2013, as well. Do you see that?	14:35
19	A. Yes.	14:35
20	Q. And tell me, what was "platform	14:35
21	simplification"?	14:35
22	A. I don't remember.	14:35
23	Q. You remember absolutely nothing about a task	14:35
24	that you were involved in called "platform	14:35
25	simplification"?	14:35

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1	MR. FALCONER: Objection.	14:35
2	THE WITNESS: I don't remember.	14:35
3	BY MR. LOESER:	14:35
4	Q. Okay. Well, let's look at what it says you	14:35
5	were doing --	14:36
6	SPECIAL MASTER GARRIE: Sorry. When we get	14:36
7	to a breaking point -- any idea when that may be?	14:36
8	MR. FALCONER: I was thinking after the	14:36
9	next -- after we are done with this document.	14:36
10	MR. LOESER: That's fine.	14:36
11	SPECIAL MASTER GARRIE: And then I would	14:36
12	like all the lawyers to be moved into another room.	14:36
13	Thank you.	14:36
14	BY MR. LOESER:	14:36
15	Q. Miss Chang, if you look at the Platform	14:36
16	Simplification task, you will see the last bullet.	14:36
17	Can you read that last bullet, please?	14:36
18	A. "Jackie leading on putting together	14:36
19	a new whitelist process with Legal	14:36
20	and Product."	14:36
21	Q. And is that accurate?	14:36
22	A. Again, I don't remember.	14:36
23	Q. So as you sit here today, you have zero	14:36
24	recollection of your being tasked with leading on	14:36
25	putting together a new whitelist process with Legal	14:36

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```
 1   and Product?                                        14:36

 2        A.   I don't remember this specifically.       14:36

 3        Q.   Do you remember anything at all about it?  14:36

 4        A.   No, I don't.                               14:36

 5        Q.   Okay.  Let's move up the string to page 2 of  14:37

 6   the string under the same heading, "Platform         14:37

 7   Simplification."                                     14:37

 8             You will see that this update, if you go   14:37

 9   farther up the string, is November 25th, 2013.  It   14:37

10   was sent by Simon Cross.  The first recipient in the  14:37

11   "to" list is you.                                    14:37

12             Do you see that?                           14:37

13        A.   Sorry.  What date?                         14:37

14        Q.   November 25th, 2013.                       14:37

15        A.   Okay.                                      14:37

16        Q.   First recipient, first person Simon put on  14:37

17   that "to" line was Jackie Chang; right?              14:37

18        A.   Well, I don't know if I'm -- I'm the first  14:37

19   person that shows up there.                          14:37

20        Q.   All right.  And let's go down to "Platform  14:37

21   Simplification."  So why don't you read the second   14:37

22   bullet.                                              14:37

23        A.   "New Whitelisting process -- Jackie        14:37

24             working closely with Marie and Legal       14:37

25             to design a fast but safe process          14:37
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1	for whitelisting apps. Spec for	14:38
2	updates to tools in progress and	14:38
3	moving towards build-stage. Audit	14:38
4	of existing Capabilities for legal	14:38
5	risk is underway."	14:38
6	Q. So do you remember working closely with	14:38
7	Marie in legal?	14:38
8	A. I don't.	14:38
9	Q. And who is Marie?	14:38
10	A. I don't know which Marie it may be referring	14:38
11	to.	14:38
12	Q. Okay. And so, Miss Chang, you're telling	14:38
13	the jury that even though this bullet indicates that	14:38
14	you were "working closely with Marie in Legal to	14:38
15	design a fast but safe process for whitelisting	
16	apps," you have utterly no recollection of anything	14:38
17	relating to that task?	14:38
18	A. Correct.	14:38
19	MR. LOESER: This is a fine time to take a	14:38
20	break, as Special Master Garrie has requested.	14:38
21	THE VIDEOGRAPHER: Okay. This marks the end	14:39
22	of media No. 3 in the deposition of Jackie Chang.	14:39
23	Going off the record. The time is 2:39.	14:39
24	(Off the record.)	14:39
25	THE VIDEOGRAPHER: This marks the beginning	15:04

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1	of media No. 4 in the deposition of Jackie Chang.	15:04
2	We are back on the record. The time is 3:04.	15:04
3	MR. LOESER: If we could mark as Exhibit 14	15:04
4	the next document, which for the record is an email	15:04
5	from Ime Archibong to Eddie O'Neil and Simon Cross,	15:04
6	dated February 9th, 2014, Subject line "Forward:	15:05
7	Our teams next steps for PS12n. Importance: High."	15:05
8	(Exhibit 14 marked for identification.)	15:05
9	BY MR. LOESER:	15:05
10	Q. Miss Chang, do you see this email?	15:05
11	A. Yes.	15:05
12	Q. And do you see that the email forwards an	15:05
13	email from Ime Archibong to you and Simon Cross on	15:05
14	the same day, February 9th, 2014?	15:05
15	A. Yes.	15:05
16	Q. What does it mean when an email is marked as	15:05
17	"Importance High"?	15:05
18	MR. FALCONER: Objection. Foundation.	15:05
19	THE WITNESS: That it's of high importance.	15:05
20	BY MR. LOESER:	15:05
21	Q. Okay. And if we look down to the email in	15:05
22	the middle of the page, a little further, there's an	15:05
23	email from you, part of this string, to -- is it	15:05
24	Ime? Ime Archibong? Am I saying that right?	15:06
25	A. Ime.	15:06

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1	Q. Ime -- to Ime and Simon Cross, and that's	15:06
2	the email that's forwarded above and then forwarded	15:06
3	above that; is that right?	15:06
4	A. Yes. Sorry, is it okay if I read the email?	15:06
5	Q. Absolutely. Yeah.	15:06
6	A. Okay.	15:07
7	Q. Okay. Let's start at the very beginning of	15:07
8	this string, if you go to the second page. At the	15:07
9	very bottom of the string is an email from Ime to	15:07
10	you and Simon Cross on February 9th, 2014, "Subject:	15:07
11	Re: Our teams next steps for PS12n." And she asks:	15:07
12	"Can I have both of you join me for	15:08
13	the second half of a Dan update	15:08
14	tomorrow -- to talk a bit more about	15:08
15	PS12N and where we are from a product	15:08
16	perspective (Simon) and a partnerships	15:08
17	perspective (Jackie)."	15:08
18	Do you see that?	15:08
19	A. Yes.	15:08
20	Q. Can you tell me what "PS12N" refers to?	15:08
21	A. I don't remember.	15:08
22	Q. Okay. And so whatever it meant, you were	15:08
23	being asked to provide your perspective on the	15:08
24	partnership perspective; is that right?	15:08
25	MR. FALCONER: Objection. Foundation.	15:08

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1	THE WITNESS: Yes.	15:08
2	BY MR. LOESER:	15:08
3	Q. Okay.	15:08
4	A. It looks like that.	15:08
5	Q. And so -- and above that is an email from	15:08
6	you at 2:19 p.m., where you say:	15:08
7	"Sure thing - can I call or VC as in	15:08
8	I'm working from LA?"	15:09
9	Do you see that?	15:09
10	A. Yes.	15:09
11	Q. Okay. And then moving up, Ime sends another	15:09
12	email about this at 2:28 and indicates what -- is it	15:09
13	a he or a she?	15:09
14	A. Sorry, who?	15:09
15	Q. Ime. It says -- well, whatever -- I think	15:09
16	it would be most helpful, Ime describes what -- what	15:09
17	in his or her view would be most helpful; right?	15:09
18	A. His.	15:09
19	Q. His, okay.	15:09
20	Is that right?	15:09
21	A. (Witness nods.)	15:09
22	Q. And the second bullet of what he thinks	15:09
23	would be helpful is directed to you; is that right?	15:09
24	A. Yes.	15:09
25	Q. And why don't you read that bullet?	15:09

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1	A. "Jackie: One slide that summarizes	15:09
2	the Partnership's" work -- "team work	15:09
3	in this launch. Maybe a quick callout	15:09
4	of the coordination work across all	15:09
5	teams in his org, and then dive	15:10
6	specifically into the work that our	15:10
7	team has to do between now and launch."	15:10
8	Q. And do you recall, looking at this, whether	15:10
9	the launch that is being referred to is the launch	15:10
10	of the new platform? Is that what "PS12N" refers	15:10
11	to?	15:10
12	A. So I -- I don't remember.	15:10
13	Q. So and then you prepare a slide, if you look	15:10
14	up the string, at 2:46 p.m. You say:	15:10
15	"Does this work for Partnerships	15:10
16	update?"	15:10
17	I assume that's in response to your	15:10
18	request -- the request for you to provide one slide	15:10
19	that summarizes the partnership teamwork?	15:10
20	A. Yes.	15:10
21	Q. Okay.	15:10
22	A. Yeah.	15:10
23	Q. All right. And then Ime makes some comments	15:10
24	on some format and language suggestions, and states:	15:10
25	"The area where I've added a couple	15:11

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1		of works in, is in the 'Exemptions'	15:11
2		section. This will be the area that	15:11
3		Dan will want to discuss the most.	15:11
4		Remember that he's of the mindset	15:11
5		that we shouldn't have a whitelist	15:11
6		for anything, so we'll have to	15:11
7		explain to him why these three	15:11
8		buckets are necessary."	15:11
9		Do you see that?	15:11
10	A.	Yes.	15:11
11	Q.	Okay. And then you respond at 4:18 -- so	15:11
12		that email was sent at 3:54, and a little bit after	15:11
13		that, you respond.	15:11
14		Can you read your response in the email	15:11
15		that's next up in the string.	15:11
16	A.	"Actually - here's an updated version.	15:11
17		I'll explain on the call, but in	15:11
18		essence, we're not going to grant any	15:11
19		exceptions, only extensions based on	15:11
20		contract and partner sensitivity,	15:11
21		where I've labeled 'exemptions' are	15:11
22		actually private APIs today that	15:11
23		allow for friend data to be read	15:11
24		(mobile rcp & public content feed).	15:11
25		I believe we should keep maintaining	15:11

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1	these APIs as private strategic	15:12
2	ones, however, it's worthwhile	15:12
3	acknowledging this as there's been	15:12
4	some confusion by partnership teams	15:12
5	on how we plan to maintain these	15:12
6	moving forward."	15:12
7	Q. Okay. So this email that you wrote shows	15:12
8	that you were involved in this discussion of whether	15:12
9	it ran exceptions or exemptions to partners for	15:12
10	friends data to be read; is that right?	15:12
11	A. It looks like it, yes.	15:12
12	Q. Okay. And you draw a distinction between	15:12
13	exceptions and extensions. And before we looked at	15:12
14	the slide, you couldn't recall what those terms	15:12
15	mean.	15:12
16	Does this refresh your recollection of what	15:12
17	you viewed as the distinction between exceptions and	15:12
18	extensions?	15:12
19	A. No.	15:12
20	Q. Okay. So even though it is a paragraph that	15:12
21	describes the difference between extensions and	15:12
22	exemptions, it doesn't refresh your recollection at	15:12
23	all as to what those terms mean to you?	15:12
24	A. I think it would mean -- "extension" meaning	15:12
25	to extend and "exemptions" mean to like to exempt.	15:13

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1	Q. Okay.	15:13
2	A. To -- to not allow or...	15:13
3	Q. All right. Well, specifically, what you	15:13
4	said is, "We're not going to grant any exceptions,	15:13
5	only extensions based on contract and partner	15:13
6	sensitivity."	15:13
7	And so it appears that what you are saying	15:13
8	is that with regard to friends data to be read by	15:13
9	partners, you're not going to grant any exceptions,	15:13
10	but you were going to grant extensions based on	15:13
11	contract and partner sensitivity.	15:13
12	Is that a fair reading?	15:13
13	MR. FALCONER: Objection to the form.	15:13
14	BY MR. LOESER:	15:13
15	Q. Does that appear to be what you wrote?	15:13
16	MR. FALCONER: Same objection.	15:13
17	THE WITNESS: Can I read it one more time?	15:13
18	Sorry.	15:13
19	So, again, I don't remember in detail, but	15:14
20	it sounds like I could be referring to a couple	15:14
21	different things, so I'm not sure if it's specific	15:14
22	to friend data.	15:14
23	BY MR. LOESER:	15:14
24	Q. Okay. Well, let's look very carefully at	15:14
25	what you wrote. You say:	15:14

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1	"Where I've labeled 'exemptions' are	15:14
2	actually private APIs today that	15:14
3	allow for friend data to be read."	15:14
4	Do you see that?	15:14
5	A. Yes.	15:14
6	Q. And so there are partners that are going to	15:14
7	continue to have access to friend data because of	15:14
8	what you've labeled "exemptions"; is that right?	15:14
9	A. So, again, I don't know what the outcome	15:14
10	was, but I see what I wrote.	15:14
11	Q. Okay. And what are "private APIs"?	15:14
12	A. To my understanding, it's APIs that aren't	15:15
13	public.	15:15
14	Q. Okay. And so this is referring to private	15:15
15	APIs that allowed access to friend data; is that	15:15
16	right?	15:15
17	A. I think that's what it says, yeah.	15:15
18	Q. Okay. And when this says "private strategic	15:15
19	ones," you say, "I believe we should be maintaining	15:15
20	these APIs as private strategic ones," and that	15:15
21	means that for -- it's an API. It's not public,	15:15
22	it's private. And "strategic" refers to the partner	15:15
23	that would be obtaining that permission; is that	15:15
24	right?	15:15
25	A. Sorry. Can you state your question again?	15:15

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1   Q.   Sure.   I'm just trying to understand the   15:15

2   terminology that you're using when you're making   15:15

3   your recommendation about exemptions or exceptions,   15:15

4   and what you are saying is that, as you indicate   15:16

5   here, you believed "we should keep maintaining these 15:16

6   APIs as private strategic ones."   15:16

7   And by "these APIs," that refers to friend   15:16

8   data to be read; is that right?   15:16

9   A.   I think so, but I don't know.   Like I don't   15:16

10   remember in specificity.   15:16

11   Q.   Okay.   But that appears to be what the email   15:16

12   that you wrote on February 9th, 2014 indicates;   15:16

13   right?   15:16

14   A.   It could be, yes.   15:16

15   Q.   Well, it's more than it could be.   It is   15:16

16   what you wrote; right?   15:16

17   A.   Well, I know what I wrote, but I don't know   15:16

18   the inference behind that.   15:16

19   Q.   So when you say but, in essence, "we are not   15:16

20   going to grant any exceptions, only extensions based 15:16

21   on a contract and partner sensitivity," what do you   15:16

22   mean by "extensions based on contract and partner   15:16

23   sensitivity"?   15:16

24   A.   So "contracts" means if we have a written   15:16

25   agreement in place.   "Partner sensitivity," I don't 15:16

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1   remember specifically what that -- what that could   15:17

2   be.   15:17

3   Q.   Okay. And whatever it means, partner   15:17

4   sensitivity was a characteristic that you're   15:17

5   suggesting Facebook take into account when deciding   15:17

6   whether to continue to allow friend data to be read   15:17

7   by the partner?   15:17

8   A.   It sounds that way, yes.   15:17

9   Q.   Okay. And if you look up to the next email 15:17

10   in the string, Ime Archibong says: 15:17

11   "Thanks. That makes it more clear.   15:17

12   I've cleaned up the chart to reflect   15:17

13   that."   15:17

14   Do you see that?   15:17

15   A.   Yes.   15:17

16   Q.   So Ime didn't have any problem understanding 15:17

17   what you meant in that email we just went through;   15:17

18   right?   15:17

19   A.   It looks like that, yes.   15:17

20   MR. FALCONER: Lacks foundation.   15:17

21   BY MR. LOESER: 15:17

22   Q.   I'm sorry. I didn't hear your answer.   15:17

23   A.   It looks like that.   15:17

24   Q.   Okay. Now, the email refers -- to your   15:17

25   email on February 9th, 2014, 4:18 p.m., states: 15:18

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1	"Actually - here's an updated version."	15:18
2	So it appears to attach a document; is that	15:18
3	right?	15:18
4	A. I don't see an attachment, but I'm guessing,	15:18
5	yes, if it's referring to it.	15:18
6	MR. LOESER: Okay. And I will represent to	15:19
7	you that the next document is the attachment to that	15:19
8	email. And I don't -- I don't see a reference to	15:19
9	attachment either, so I'm not sure how that works.	15:19
10	But I think in the manner it was produced, this was	15:19
11	attached to that email.	15:19
12	And we'll confirm that for the record later,	15:19
13	Russ, just to make sure that we are right about	15:19
14	that, but that's my understanding.	15:19
15	So if we could look at Exhibit 15.	15:19
16	(Exhibit 15 marked for identification.)	15:19
17	BY MR. LOESER:	15:19
18	Q. And before we get to that, do you recall the	15:19
19	difference between a "whitelist" and a "private	15:19
20	API"?	15:19
21	A. I don't recall if they're the same or not.	15:19
22	Q. Okay. Let's look at this attachment, which	15:20
23	has the heading, "[PS12N] Product Update - What Are	15:20
24	We Announcing?"	15:20
25	Do you see this slide?	15:20

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```
 1        A.   Yes.                                    15:20

 2        Q.   Okay.  If you could please read the third  15:20

 3   bullet.                                          15:20

 4        A.   "Removing access to non-app friends.   15:20

 5             Friend_permissions being deprecated -  15:20

 6             apps will only get data about people   15:20

 7             who've explicitly logged-in with       15:20

 8             Facebook, not that user's incognizant  15:20

 9             friends.  We're building new APIs to   15:20

10             handle tagging non-app friends and     15:20

11             inviting your friends to use/play the  15:20

12             app with you."                         15:20

13        Q.   Okay.  And do you recall the -- that as part  15:20

14   of this PS12 update, there was going to be the   15:20

15   removal of access to non-app friends permissions?  15:20

16        A.   So I don't remember.                   15:21

17        Q.   Okay.  And if you look at -- can you read  15:21

18   the next bullet.                                 15:21

19        A.   "Read_stream (timeline API, Newsfeed   15:21

20             API) being publicly deprecated.        15:21

21             Partner/contract only."                15:21

22        Q.   Okay.  Do you know what that means and do  15:21

23   you recall that happening?                       15:21

24        A.   I know what I think partner and contract  15:21

25   only means that you have to have a contract, but I  15:21
```

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1	don't remember what happened afterwards.	15:21
2	Q. And according to the email, you worked on	15:21
3	this slide. And, in fact, if you look back, what	15:21
4	the email said was -- you were asked specifically to	15:21
5	create the slide for -- one slide that summarizes	15:21
6	the partnership's team work on this launch.	15:21
7	Do you have any recollection of creating	15:22
8	anything having to do with this slide deck?	15:22
9	A. I don't even know what page it would be.	15:22
10	I've been asked to create many slide decks, and I	15:22
11	was working on a lot of projects, so I don't	15:22
12	remember this specifically.	15:22
13	Q. Let's go to the third page of the deck.	15:22
14	A. Yeah.	15:22
15	Q. Do you see the heading, "Partnerships	15:22
16	Update"?	15:22
17	A. Yep. Yes.	15:22
18	Q. Do you recall creating this slide?	15:22
19	A. I don't remember.	15:22
20	Q. Nonetheless, it looks like the partnership	15:22
21	update that you were asked to prepare; is that	15:22
22	right?	15:22
23	A. I would assume so.	15:22
24	Q. Now, if -- the first bullet says, "Partner	15:22
25	Identification and Impact Assessment"; is that	15:22

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1	right?	15:22
2	A. Yes.	15:22
3	Q. And it says:	15:22
4	"Product identified the 26k App IDs	15:22
5	and 45+ affected APIs."	15:23
6	Do you see that?	15:23
7	A. Yes.	15:23
8	Q. And do you recall getting information from	15:23
9	products about the 26,000 app IDs and the 45-plus	15:23
10	affected APIs?	15:23
11	A. I don't remember specifically.	15:23
12	Q. Okay. Let's look at that second bullet,	15:23
13	which has to do with that topic that you wrote so	15:23
14	clearly about to Ime, "Extensions." That bullet	15:23
15	says, "Extensions and Private API Identification."	15:23
16	Do you see that?	15:23
17	A. Sorry, say that again.	15:23
18	Q. You see the bullet "Extensions and Private	15:23
19	API Identification"?	15:23
20	A. Oh, yes.	15:23
21	Q. Can you read the material that's under that	15:23
22	bullet.	15:23
23	A. "Granting no exemptions, except in	15:23
24	the cases where we have:	15:23
25	"1. Wind-down.	15:23

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1	"Non-standard Platform Agreements	15:23
2	specifying unique Backwards	15:23
3	Compatibility (Amazon).	15:23
4	"Sensitive/strategic partner	15:24
5	integrations requiring extension	15:24
6	(Ford)	15:24
7	"2. Private APIs.	15:24
8	"Private use-cases for exemption	15:24
9	(Mobile RCP)."	15:24
10	Q. And do you recall coming up with that	15:24
11	approach to dealing with extensions and private API	15:24
12	identification?	15:24
13	A. So, again, I don't remember this in	15:24
14	specificity. I think this was like one of many	15:24
15	projects I was working on, and I think most of it	15:24
16	was aggregating information.	15:24
17	Q. Okay. But this -- that particular bullet	15:24
18	reflects what you indicated in the email you wrote	15:24
19	to Ime on February 9th, 2014, generally; right?	15:24
20	It's consistent with what you wrote to him about	15:24
21	what was going to happen with extensions and private	15:24
22	API identification?	15:24
23	A. Yes. If it was in the email, then yes.	15:24
24	MR. LOESER: Okay. Let's go to the next	15:25
25	exhibit is a video clip that I want to play to you.	15:25

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1	And it's not very long. And then we'll have a	15:25
2	transcript of it as well to the extent that it is	15:25
3	not clear.	15:25
4	DEPOSITION REPORTER: Excuse me, Counsel,	15:25
5	are you going to want this reported?	15:25
6	MR. LOESER: I think you'll be able to.	15:25
7	It's not -- it's Mark Zuckerberg speaking and he's	15:25
8	not speaking terribly quickly, but we have a	15:25
9	transcript so -- you know what, I wouldn't bother	15:25
10	reporting it. We will just have the transcript	15:25
11	admitted after we play the recording.	15:25
12	DEPOSITION REPORTER: Thank you.	15:25
13	MR. LOESER: Actually, hang on one second	15:25
14	before we do that. If we can go back to the last	15:26
15	exhibit.	15:26
16	BY MR. LOESER:	15:26
17	Q. So I want to make sure I understand what	15:26
18	this slide indicates for access to the APIs that	15:26
19	were being deprecated in this new platform.	15:26
20	So under the first number, No. 1,	15:26
21	"Wind-down," so this describes the situations in	15:26
22	which the API -- for partners for which the API will	15:26
23	not be deprecated.	15:26
24	So it says, "Wind-down":	15:26
25	"Granting no exceptions, except in	15:26

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1	cases where we have:"	15:26
2	Number 1 is "Wind-down."	15:27
3	So the first group of partners for which the	15:27
4	friend permissions would not be deprecated are	15:27
5	"Non-standard Platform Agreements specifying unique	15:27
6	Backwards Compatibility."	15:27
7	Do you see that?	15:27
8	A. Yes.	15:27
9	Q. And then the second category of partners for	15:27
10	which the friends permissions would not be	15:27
11	deprecated were "Sensitive/strategic partner	15:27
12	integrations requiring extension."	15:27
13	Do you see that?	15:27
14	A. Yes.	15:27
15	Q. And then the third category of partners for	15:27
16	which the friends permissions would not be	15:27
17	deprecated were "Private APIs." And that indicates	15:27
18	"private use-cases for exemption."	15:27
19	Is that right?	15:27
20	A. It looks like that, yes.	15:27
21	Q. And so based on the work that you did in	15:27
22	this project of working with partners to identify	15:27
23	which should have the friends deprecated and which	15:27
24	not, you certainly knew that there was a group of	15:28
25	partners for whom the friends permissions were not	15:28

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1	going to be taken away; right?	15:28
2	A. I mean, I don't really remember in detail,	15:28
3	but if it's what it says, yes.	15:28
4	Q. Yeah, that's what these various email that	15:28
5	you were involved -- the projects that you were	15:28
6	involved in, that's what -- that's what that showed;	15:28
7	right? It showed that there was this population of	15:28
8	partners, and even though the public API was	15:28
9	deprecated for those partners, they would continue	15:28
10	to have access to the friends permissions; right?	15:28
11	A. Well, I don't know specifically, because it	15:28
12	sounds like there's different categories, and I just	15:28
13	don't want to assume like -- like blanket assume	15:28
14	across the board.	15:28
15	Q. But you --	15:28
16	A. Because I don't -- I don't know in detail.	15:28
17	Q. Yeah. But you can state clearly and	15:28
18	affirmatively that when the friends permissions were	15:28
19	deprecated, it did not take away that permission	15:28
20	from all partners and developers that interacted	15:28
21	with Facebook; right?	15:29
22	MR. FALCONER: Objection. Form.	15:29
23	THE WITNESS: So, again, I don't know what	15:29
24	the timing of everything was, so I don't know like	15:29
25	when things intersected.	15:29

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1	BY MR. LOESER:	15:29
2	Q. Miss Chang, you know from the work that you	15:29
3	did that there was going to be a group of partners	15:29
4	for whom there would be exemptions to the	15:29
5	deprecation of friend sharing; right?	15:29
6	A. It looks like that in the email, yes.	15:29
7	MR. LOESER: Okay. We can go to the next	15:29
8	exhibit.	15:29
9	(Exhibit 16 and Exhibit 17 marked for	15:29
10	identification.)	15:29
11	BY MR. LOESER:	15:29
12	Q. Now, having gone through all these emails	15:29
13	now, do you remember the connection between the	15:29
14	introduction of the new platform and the transition	15:30
15	from Graph API version 1 to version 2?	15:30
16	A. I don't remember in specificity like what	15:30
17	date and things around that. This was a lot of	15:30
18	stuff going on that's all blurred together, so not	15:30
19	with like full certainty.	15:30
20	Q. And do you remember, as a general matter,	15:30
21	that when the new platform came on and there was a	15:30
22	transition from the older Graph to the new Graph,	15:30
23	that two of the things specifically that happened	15:30
24	was that friends permissions were publicly	15:30
25	deprecated; right?	15:30

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1	MR. FALCONER: Objection. Form.	15:30
2	BY MR. LOESER:	15:30
3	Q. I'm sorry. Let me ask again.	15:30
4	Putting aside the terminology and what Graph	15:30
5	version it was and what platform it was, there was a	15:30
6	new platform that was introduced. And in that	15:30
7	new -- that new platform, Facebook publicly	15:30
8	announced that it was -- that it was deprecating	15:30
9	friend permissions; right?	15:30
10	MR. FALCONER: Objection. Form.	15:30
11	THE WITNESS: I think so. I don't -- I	15:31
12	don't remember specifically like which announcement.	15:31
13	Sorry, there's a lot of F8s, so I think this is what	15:31
14	the picture is, so I don't remember.	15:31
15	MR. LOESER: Yeah. Let's go ahead and play	15:31
16	this. Maybe it will jog your memory.	15:31
17	(Video played.)	15:31
18	MR. LOESER: Let's try this again because	15:31
19	there is an echo.	15:31
20	(Video played.)	15:31
21	BY MR. LOESER:	15:32
22	Q. We'll go through the transcript itself	15:32
23	because there was some echo there.	15:32
24	But you know what an "F8 Conference" is?	15:32
25	A. Yes.	15:32

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1	Q. And what we just showed you was from the	15:32
2	April 30th, 2014 F8 Conference. And do you recall,	15:32
3	did you attend that conference?	15:33
4	MR. FALCONER: Objection. Form.	15:33
5	THE WITNESS: I -- actually, I don't	15:33
6	remember. I've been to many, but I don't know the	15:33
7	exact dates of which ones I've gone to, and I've	15:33
8	also missed some, as well, so I don't know which	15:33
9	one.	15:33
10	BY MR. LOESER:	15:33
11	Q. Okay. And I'm going to read for you what	15:33
12	Mr. Zuckerberg just said, and you can tell me if	15:33
13	this refreshes your recollection of whether you were	15:33
14	in attendance at this conference.	15:33
15	What Mr. Zuckerberg said was:	15:33
16	"We've also heard that sometimes you	15:33
17	can be surprised when one of your	15:33
18	friends shares some of your data with	15:33
19	an app. So now we're going to change	15:33
20	this and we're going to make it so	15:33
21	that now everyone has to choose to	
22	share their own data with an app	15:33
23	themselves. We think this is really"	15:33
24	important -- "a really important step	15:33
25	for giving people power and control	15:33

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1	over how they share their data in	15:33
2	apps."	15:33
3	Do you recall Mr. Zuckerberg saying that?	15:33
4	A. Again, I don't remember. A lot of these all	15:33
5	blurred together, so I don't remember that specific	15:34
6	one.	15:34
7	Q. Now, as we just went through looking at your	15:34
8	email, you were very involved in figuring out which	15:34
9	partners would have friend sharing deprecated and	15:34
10	which would not; right? That's what those emails	15:34
11	showed.	15:34
12	A. Not specific to friends. I think to a lot	15:34
13	of permissions.	15:34
14	Q. But including the friends permissions;	15:34
15	right?	15:34
16	A. Yes, that seems to be one of them.	15:34
17	Q. Okay. And so when Mr. Zuckerberg is talking	15:34
18	about how friends permissions were going away, at	15:34
19	the time he was saying that in April 30th, 2018	15:34
20	[verbatim], that was shortly after the email that we	15:34
21	went through in which you were talking about the	15:34
22	partners for whom friend sharing was not going to go	15:34
23	away. Isn't that right?	15:34
24	A. I -- if that's what it shows. I don't	15:34
25	recall specifically.	15:35

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1	Q. Let's go back to your February 9th, 2014	15:35
2	email, which is Exhibit 14. And, again, what you	15:35
3	wrote was:	15:35
4	"I'll explain on the call but, in	15:35
5	essence we're not going to grant any	15:35
6	exceptions, only extensions based on	15:35
7	contract and partner sensitivity.	15:35
8	Where I've labeled 'exemptions' are	
9	actually private APIs today that allow	15:35
10	for friend data to be read. I believe	15:35
11	we should keep maintaining these APIs	15:35
12	as private strategic ones."	15:35
13	Right? So that pretty clearly indicates	15:35
14	that for those private strategic ones, for those	15:35
15	partners, the friends data was going to be	15:35
16	continued -- they were going to continue to be	15:35
17	allowed to read that data; right?	15:35
18	A. I'm sorry. What was the date of the video?	15:35
19	Q. The video was April 30th, 2014.	15:35
20	A. So this is before or...	15:36
21	Q. Yes. Your email was before that video.	15:36
22	Your email is describing the partners for whom	15:36
23	access to friend data would continue; right?	15:36
24	A. I guess. Sorry, continued for what? I...	15:36
25	Q. To continue for -- you know full well from	15:36

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1	the work you did that there were partners that would	15:36
2	continue to have access to friend permissions;	15:36
3	right?	15:36
4	A. Again, I don't know when you say "continue,"	15:36
5	like -- like what specific dates, but this seems to	15:36
6	be said before the video.	15:36
7	Q. Okay. So before the video, you were	15:37
8	involved in a project to figure out which partners	15:37
9	would continue to have access to friends	15:37
10	permissions; right?	15:37
11	A. Yes -- or not specific to friends, but like	15:37
12	a bunch of different permissions, it looks like.	15:37
13	Q. Including friends; right?	15:37
14	A. Yes.	15:37
15	Q. Okay. And, then, on April 30th,	15:37
16	Mr. Zuckerberg publicly announced that friends	15:37
17	permissions were going away; right?	15:37
18	A. Per that video, yes.	15:37
19	Q. And, in fact, he said, "We're going to make	15:37
20	it so that now everyone has to choose to share their	15:37
21	own data with an app themselves"; right?	15:37
22	A. Yes.	15:37
23	Q. And so that would mean that no app would get	15:37
24	access to data about anyone other than the Facebook	15:37
25	user using the app. Isn't that what he described?	15:37

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1	A. Yes.	15:37
2	Q. Now, Mr. Chang, you knew at the time --	15:37
3	A. Sorry, Mrs.	15:37
4	Q. Miss Chang. I'm sorry.	15:37
5	A. Yeah.	15:38
6	Q. You knew at the time that it was not true	15:38
7	that after -- that friends permissions had gone away	15:38
8	for all apps; right?	15:38
9	A. Sorry, can you say it again?	15:38
10	Q. You knew at the time of the F8 presentation	15:38
11	in April of 2014 that some app developers and	15:38
12	partners with nonstandard platform agreements were	15:38
13	given continued access to friend permission; right?	15:38
14	A. It sounds like they had the ability to have	15:38
15	that, yes.	15:38
16	Q. Okay. And you knew at the time of	15:38
17	Mr. Zuckerberg's April 2014 presentation that some	15:38
18	sensitive and strategic partners were given	15:38
19	continued access to friends permissions; right?	15:38
20	A. Well, again, I don't remember the dates, but	15:38
21	per whatever the email says.	15:39
22	Q. So that's a yes?	15:39
23	MR. FALCONER: Objection. Foundation and	15:39
24	form.	15:39
25	/ / /	15:39

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1	BY MR. LOESER:	15:39
2	Q. I'll ask again. You knew at the time of	15:39
3	Mr. Zuckerberg's April 2014 keynote address that	15:39
4	some sensitive and strategic partners were given	15:39
5	continued access to friends permissions; right?	15:39
6	A. I don't know if I knew at that moment	15:39
7	specific to what he was saying. I don't even know	15:39
8	if I was there so...	15:39
9	Q. Right. But you knew, based on the work that	15:39
10	you did and the framework that you discussed with	15:39
11	your colleagues, that there was a group of sensitive	15:39
12	and strategic partners who were going to be given	15:39
13	continued access to friends permissions; right?	15:39
14	A. Yes. That's what it looks like.	15:39
15	Q. Okay. And at the time of Mr. Zuckerberg's	15:39
16	presentation in April 2014, you also knew that there	15:39
17	were some app developers and partners with private	15:40
18	APIs that were given continued access to friends	15:40
19	permission; right?	15:40
20	A. I don't know. I can't really speculate at	15:40
21	that moment in time in terms of how you're trying to	15:40
22	connect the two.	15:40
23	Q. Well, prior to April, in the February and	15:40
24	the timeframe in the emails that we went through,	15:40
25	you discussed a framework of what types of partners	15:40

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1	would continue receiving friend data. Isn't that	15:40
2	right?	15:40
3	A. Yes, the framework. But I think you're	15:40
4	connecting it to something else, and I don't know	15:40
5	that.	15:40
6	Q. Okay. And your framework had continued	15:40
7	access to friend data for what you described as	15:40
8	"private APIs"; right?	15:40
9	A. That's what it looks like in terms of a	15:40
10	proposal.	15:40
11	Q. Now, Mr. Zuckerberg said:	15:40
12	"We're going to make it so that now	15:41
13	everyone has to choose to share their	15:41
14	own data with an app themselves."	15:41
15	Is that right?	15:41
16	A. Correct.	15:41
17	Q. And yet, for those apps and developers that	15:41
18	had continued access to friend data, that wasn't	15:41
19	true; right?	15:41
20	A. I -- I don't think so, because I think what	15:41
21	you're saying is that users have to choose. And a	15:41
22	permission, from my understanding, is the ability to	15:41
23	generate dialogue to ask for permission. So the	15:41
24	user would still have to choose to provide it.	15:41
25	Q. So when a private API provides a partner	15:41

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1	with access to friend data permissions, right, that	15:41
2	partner can access friend data through that	15:41
3	permission; is that right?	15:41
4	A. My understanding --	15:41
5	MR. FALCONER: Objection. Objection. Form.	15:42
6	THE WITNESS: My understanding is that it's	15:42
7	the ability to ask a user for that.	15:42
8	BY MR. LOESER:	15:42
9	Q. And -- now, you didn't hear Mr. Zuckerberg	15:42
10	say at that keynote address that there was a	15:42
11	population of partners that would continue to have	15:42
12	access to friends data, did you?	15:42
13	A. No, I didn't hear that.	15:42
14	Q. And, Miss Chang, do you recall that you --	15:42
15	that you attended that conference and you were	15:42
16	involved in -- you had a presentation yourself	15:42
17	there?	15:42
18	A. I don't know if it was that year. I have	15:42
19	been involved at F8. I have been a couple years. I	15:42
20	don't know if it was that specific one.	15:42
21	So, yes, it could be possible. I just -- I	15:43
22	don't remember that specific one.	15:43
23	MR. LOESER: Okay. We can go to the next	15:43
24	exhibit. It's Exhibit 18.	15:43
25	(Exhibit 18 marked for identification.)	15:43

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1	BY MR. LOESER:	15:43
2	Q. Miss Chang, you are looking at an email from	15:43
3	yourself to Deborah Liu, among others, dated March	15:44
4	23rd, 2014. The subject, "Re: Amazon: Platform	15:44
5	agreement amendment."	15:44
6	Do you see that?	15:44
7	A. Yes.	15:44
8	Q. And this email string concerns a discussion	15:44
9	about a platform agreement with Amazon; is that	15:44
10	right?	15:44
11	A. Yes.	15:44
12	Q. And what is a "platform agreement"?	15:44
13	A. Well, it says "platform agreement	15:44
14	amendment."	15:44
15	Q. Okay. Can you tell me what a "platform	15:44
16	agreement" is?	15:44
17	A. It's an agreement related to platform use.	15:44
18	Q. And does it describe the types of APIs that	15:45
19	the partner is able to access?	15:45
20	A. I think that depends on the agreement.	15:45
21	Q. Is that one of the things that partnership	15:45
22	agreements tend to cover?	15:45
23	A. Again, I don't -- I can't speak for all	15:45
24	agreements. I don't know about all agreements.	15:45
25	Q. Well, let's talk about this particular	15:45

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1	agreement.	15:45
2	A. Amendment to an agreement, yes.	15:45
3	Q. You were obviously involved in the	15:45
4	discussions about the amendment to the Amazon	15:45
5	partnership agreement in March of 2014; is that	15:45
6	right?	15:45
7	A. Yes.	15:45
8	Q. Why don't we go back into the string, and	15:45
9	look at the third page.	15:46
10	A. Is it okay if I read through?	15:46
11	Q. Yeah, please.	15:46
12	A. Thank you.	15:46
13	Q. I just have a couple questions, so if you	15:46
14	want to skim it, you can probably save yourself some	15:46
15	time.	15:46
16	A. Okay. Yes. Okay.	15:46
17	Q. So this is a discussion about the	15:46
18	permissions that -- well, let's go to page 3 and	15:47
19	just look at -- there's an email from -- it starts	15:47
20	at the bottom of page 2, Rob Daniel to Mike Vernal,	15:47
21	dated March 22nd, 2014.	15:47
22	Do you recall who Rob Daniel is?	15:47
23	A. Yes, he was in business development.	15:47
24	Q. Okay. Was he -- it appears he was	15:47
25	responsible for the Amazon contract; is that right?	15:47

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 1        A.    The agreement, yes.  Well, I don't know for   15:47

 2   the original agreement, but from what it's            15:47

 3   referencing here, the amendment.                      15:47

 4        Q.    Okay.  And who was Mike Vernal?            15:47

 5        A.    He was the engineering director for the    15:47

 6   platform.                                             15:47

 7        Q.    Okay.  So if you look at the top of page 3  15:47

 8   it states:                                            15:48

 9             "Hi Mike, We've settled on terms with      15:48

10             Amazon for our amended platform            15:48

11             agreement.  Far below are the detailed      15:48

12             terms and overall value exchange."         15:48

13             Can you tell me what is meant by a "value   15:48

14   exchange" in a partnership agreement?                15:48

15        A.    So like I mentioned earlier, it's, you know, 15:48

16   being able to provide a value, like if a -- if a     15:48

17   user found value to the experience and, you know,    15:48

18   the other side had access to API, that's a good      15:48

19   value exchange.                                       15:48

20        Q.    Okay.  So it's information -- one way of   15:48

21   having value exchange is when Facebook provides      15:48

22   information to the partner, like Amazon, and Amazon  15:48

23   provides information back to Facebook; right?        15:48

24        A.    I wouldn't classify it that.  So I would say 15:48

25   it's -- it could be like API, like in terms of if    15:48
```

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1	it's permissioned for people. So like the example	15:49
2	with Kindle, so if a person is agreeing to have more	15:49
3	of a personalized experience, and then they can	15:49
4	publish back to Facebook, it's in that sense.	15:49
5	But it's -- I wouldn't classify it as	15:49
6	information. It's the person choosing that, and	15:49
7	then the experience is the integration itself being	15:49
8	built.	15:49
9	Q. Okay. So you wouldn't classify that as	15:49
10	information?	15:49
11	A. No.	15:49
12	Q. Okay.	15:49
13	A. That would be an oversimplification.	15:49
14	Q. Okay. Well, let's look at the email from --	15:49
15	to Mike from Bob Daniel. It says again:	15:49
16	"We've settled on terms with Amazon	15:49
17	for our amended platform agreement.	15:49
18	Far below are the detailed terms and	15:49
19	overall value exchange. Immediately	15:49
20	below is a quick summary.	15:49
21	"Term: 2 years."	15:49
22	Do you see the second bullet?	15:49
23	A. "Increased the information Amazon	15:49
24	provides us during the app approval	15:50
25	process."	15:50

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1   Q.   Okay. So that's how the -- what's provided   15:50

2   is characterized by Mike to -- or to Mike by Rob   15:50

3   Daniel as information; right?   15:50

4   MR. FALCONER: Objection. Form.   15:50

5   THE WITNESS: So the information here would   15:50

6   be what Amazon provides us like wire frames.   15:50

7   BY MR. LOESER: 15:50

8   Q.   What do you mean by "wire frames"?   15:50

9   A.   The detailed workflow of the integration.   15:50

10   Q.   Okay. And then you read down, you said: 15:50

11   "Aligned our breaking change notice   15:50

12   requirement for non-device integrations   15:50

13   with our standard developer promise."   15:50

14   Do you know what that means?   15:50

15   A.   I don't remember specifically.   15:50

16   Q.   Okay. And if you keep reading, it goes into   15:50

17   some detail on the information that is provided by   15:50

18   this partnership agreement. And it states: 15:50

19   "Provides Facebook allowances for (a)   15:51

20   social content API and (b) our ability   15:51

21   to extract high level 'interest'   15:51

22   categories from Amazon OG data (e.g.,   15:51

23   A user is interested in 'thrillers' or   15:51

24   'mysteries')."   15:51

25   So what does it mean to say "our ability to   15:51

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```
 1    extract high level 'interest' categories from Amazon   15:51

 2    OG data"?                                               15:51

 3        A.   So --                                          15:51

 4             MR. FALCONER:  Objection.  Foundation.         15:51

 5             Go ahead.                                      15:51

 6             THE WITNESS:  So I believe it's what they      15:51

 7    publish back to Facebook.                               15:51

 8    BY MR. LOESER:                                          15:51

 9        Q.   Okay.  So it's information that Facebook is    15:51

10    getting from Amazon about users; right?                 15:51

11        A.   I wouldn't classify it that way.  I would      15:51

12    say it's based off of a user publishing it back to      15:51

13    Facebook and containing attributes that have better     15:51

14    classifications.                                        15:52

15        Q.   Okay.  Why don't you explain what you mean     15:52

16    by that.                                                15:52

17        A.   I think how you're describing it sounds more   15:52

18    passive versus what -- I think the intent here is       15:52

19    saying that if a user publishes back, it would have     15:52

20    more detailed attributes to it like what book title     15:52

21    it -- the person read, if they're publishing a quote    15:52

22    from the Kindle.                                        15:52

23        Q.   Okay.  That's how you interpret the phrase     15:52

24    "our ability to extract high level interest             15:52

25    categories from Amazon OG data"?                        15:52
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1	A. Yes.	15:52
2	Q. And what is "OG data"?	15:52
3	A. Open Graph.	15:52
4	Q. And so how would Facebook extract high level	15:52
5	interest categories from Amazon Open Graph data?	15:52
6	How does that work?	15:52
7	A. Yeah. So it would -- through how it's	15:52
8	published, meaning if you publish back something --	15:53
9	so, again, I'm not technical, so I think like from	15:53
10	my understanding of it, when it publishes back, you	15:53
11	can incorporate attributes, so like a book title.	15:53
12	So you're able to --	15:53
13	Q. Publish back. I'm sorry to interrupt, but	15:53
14	when you say "publish back," what does that mean?	15:53
15	MR. FALCONER: Yeah. Can you -- go ahead	15:53
16	and finish your last answer if you weren't finished.	15:53
17	THE WITNESS: Oh, sorry.	15:53
18	BY MR. LOESER:	15:53
19	Q. Sorry for interrupting. Go ahead.	15:53
20	A. So, for example, if a user decided to	15:53
21	highlight and share a quote from the Kindle and they	15:53
22	published it back, meaning they chose to share it,	15:53
23	when it published back, it would tell us like what	15:53
24	book that it was pertaining to.	15:53
25	Q. So you're talking about activity on the	15:53

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1	Amazon platform, that a user interacts with an	15:53
2	Amazon platform, and then Facebook can obtain that	15:53
3	information from the Amazon platform through the OG	15:53
4	Graph?	15:54
5	A. So, again, I wouldn't put it that way	15:54
6	because I think what -- how you're describing it	15:54
7	makes it sound like we can just magically pull	15:54
8	anything.	15:54
9	So my understanding is if a user publishes a	15:54
10	quote, for example, so they actively clicked on a	15:54
11	share button for a quote they highlighted, it would	15:54
12	contain more attributes to that -- that highlighted	15:54
13	portion shared.	15:54
14	Q. And then Facebook would get that	15:54
15	information?	15:54
16	A. It would be published back to Facebook.	15:54
17	Q. Okay.	15:54
18	MR. LOESER: Exhibit 19.	15:54
19	(Exhibit 19 marked for identification.)	15:55
20	BY MR. LOESER:	15:55
21	Q. This is an email -- Exhibit 19 is an email	15:55
22	string from Ime Archibong to, among others, you,	15:55
23	dated September 4th, 2012, Subject, "Re: Amazon:	15:55
24	Cloud Drive Photo Importing from Facebook." And it	15:55
25	is very long string, and I'm going to start at the	15:55

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1	very, very end of it and work through it.	15:55
2	So first, if you want to take a minute to	15:55
3	familiarize yourself with it, that's fine, and I	15:55
4	will ask you some specific questions that --	15:55
5	A. Yes, please.	15:55
6	Q. Okay. Are you ready to answer a few	15:59
7	questions about this document?	15:59
8	A. I didn't read it fully, but sure.	15:59
9	Q. Okay. And then, I think you'll -- we will	15:59
10	work our way through it.	15:59
11	A. Okay.	15:59
12	Q. If you need to look at it more, that's, of	15:59
13	course, fine.	15:59
14	Okay. So the string ends on September 4,	15:59
15	2012. To go all the way back to the beginning of	15:59
16	the string, there is an email from Cory Toedebus,	15:59
17	dated October 31st, 2012, and the email is to you.	15:59
18	And he says:	15:59
19	"Jackie, Per our conversation,	15:59
20	attached are screenshots of the Cloud	15:59
21	Drive photo integration. This was	15:59
22	the demo that Lenn and Aaron saw, also	16:00
23	a few other shots for reference. Let	16:00
24	us know what else you need. Reminder,	16:00
25	this is highly confidential and	

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1	sensitive so please treat appropriately."	
2	Do you see that?	16:00
3	A. Yes.	16:00
4	Q. And then you have an email that you send	16:00
5	back to Mr. Toedebus in which you state:	
6	"Do you have a screenshot of the	16:00
7	permissions dialogue that the user	16:00
8	will see? Also, do you have any	16:00
9	sharing feature back to Facebook in	16:00
10	relations to photos? This just looks	16:00
11	like pure import correct?"	16:00
12	So when you say "this just looks like pure	16:00
13	import," are you saying that it looks like Amazon is	16:00
14	just getting information from Facebook and not a	16:00
15	sharing of information; right?	16:00
16	MR. FALCONER: Objection. Form.	16:00
17	THE WITNESS: I wouldn't say -- so I think	16:00
18	how you are stating it sounds passive. I think what	16:00
19	we are trying to say is like having an actual like	16:00
20	feature, a feature that allows users to share back.	16:00
21	BY MR. LOESER:	16:01
22	Q. Okay. And that sharing back and forth	16:01
23	between these two platforms, that's something that	16:01
24	you would call reciprocity; right?	16:01
25	A. Yes.	16:01

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1	Q. Okay. And, in fact, if you move up the	16:01
2	string to -- there is an entry -- on August 31st,	16:01
3	2012, there is an email from you. And at this	16:01
4	point, you are having a conversation with Chris	16:01
5	Daniels about this photos issue with Amazon. And	16:01
6	you write:	16:01
7	"Agreed on getting more clarity	16:01
8	around reciprocity as we are going	16:01
9	to see this more and more with Amazon.	16:01
10	They're strategically looking for more	16:01
11	entry points to get users to connect	16:01
12	and to pull as much data in their	16:01
13	words to 'pre-process their FB share	16:01
14	data in conjunction with Amazon data	16:02
15	to improve their shopping experience	16:02
16	in that visit'; however, making no	16:02
17	promises on publishing back."	16:02
18	A. I believe you added the word "share" in	16:02
19	there but, yes, I see what you are saying.	16:02
20	Q. Okay. That's -- I'm not sure where I added	16:02
21	that word, but what I read, minus that word, is what	16:02
22	you wrote in this email; right?	16:02
23	A. Yes.	16:02
24	Q. Okay. And then you go on and say:	16:02
25	"They also making no promises or	16:02

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1	indication that they want to move	16:02
2	forward with publishing read action	16:02
3	from Kindle or converting post-	16:02
4	purchase sharing. At this point,	16:02
5	they have not contributed anything	16:02
6	of value back to the Open Graph, but	16:02
7	has taken more than enough value	16:02
8	from our data."	16:02
9	Can you explain to you -- explain to me what	16:02
10	you mean there?	16:02
11	A. In terms of -- I think -- so I don't	16:02
12	remember specifically, but I think what I'm	16:03
13	referencing to is like publishing instances, like	16:03
14	the ability to produce dialogues for users to agree	16:03
15	to sharing back.	16:03
16	Q. All right. And when you say "at this point,	16:03
17	they have -- they have not contributed anything of	16:03
18	value back to Open Graph," what do you mean? What	16:03
19	would be contributing value back to Open Graph?	16:03
20	A. So like I said in there, converting	16:03
21	post-purchase share, so offering the user the	16:03
22	ability to share that they bought something on	16:03
23	Facebook.	16:03
24	Q. And so that would be information that then	16:03
25	Facebook acquires about that user's activity with	16:03

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1	Amazon; right?	16:03
2	A. So, I wouldn't say it's about Facebook	16:03
3	acquiring. It would be the user publishing it back	16:04
4	to Facebook.	16:04
5	Q. Right. And then Facebook has that	16:04
6	information; right? It doesn't just --	16:04
7	A. In Facebook --	16:04
8	Q. -- Facebook collects that information about	16:04
9	that user; right?	16:04
10	A. Well, it's based on the user publishing it.	16:04
11	Q. Okay. It adds to the information Facebook	16:04
12	has about the user.	16:04
13	A. It's based off of what the user has decided	16:04
14	to share back to Facebook.	16:04
15	Q. Okay. We can go up the string. On the next	16:04
16	page, there's an email from Mike Vernal, September	16:04
17	1st, 2012, and he writes:	16:04
18	"This seems strictly good for them	16:04
19	and bad for us, right? They're	16:04
20	pulling data out of the system	16:04
21	permanently into their cloud store,	16:04
22	which has infrastructure costs,	16:04
23	potential engagement costs (if	16:05
24	people consume these more here than	16:05
25	from a Facebook experience) and,	16:05

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1	hence, revenue costs (lost inventory)."	16:05
2	Do you understand what he is saying there?	16:05
3	A. I don't understand his intent behind that.	16:05
4	Q. Do you understand what he means by "pulling	16:05
5	data out of the system"?	16:05
6	A. No, I don't.	16:05
7	Q. Okay. That -- to you, that doesn't mean	16:05
8	Amazon collecting information about Facebook users?	16:05
9	MR. FALCONER: Objection. Asked and	16:05
10	answered.	16:05
11	THE WITNESS: I -- yeah. I don't know.	16:05
12	BY MR. LOESER:	16:05
13	Q. Okay. Let's go down. He says:	16:05
14	"I really think two things:	16:05
15	"1/There needs to be some kind of	16:05
16	reciprocity here; either they need to	16:05
17	be contributing data back to the Graph,	16:05
18	or they need to be exposing API end	16:05
19	points we can call to reciprocate."	16:05
20	Do you understand that?	16:05
21	A. I don't understand it in the context that	16:05
22	he's saying it, which is probably more technical	16:06
23	than I'm familiar with it.	16:06
24	Q. Okay. Isn't he saying that in its --	16:06
25	Facebook's relationship with Amazon, Facebook wants	16:06

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1	to obtain information from Amazon about users that	16:06
2	would contribute data back to the Facebook Graph;	16:06
3	right? Isn't that pretty clear?	16:06
4	A. So I wouldn't state it that way. So, again,	16:06
5	like I mentioned earlier, it's about creating	16:06
6	sharing options on both sides, so users can choose	16:06
7	to share -- share stories back and forth. So	16:06
8	creating opportunities for users to share.	16:06
9	Q. Okay. Then we can go to the first page of	16:06
10	the string. And this conversation has continued for	16:06
11	quite a while about what information Amazon was	16:06
12	pulling from the Facebook Graph and what information	16:06
13	Facebook wants to pull from the Amazon Graph.	16:07
14	And if you look at your email on September	16:07
15	3rd, 2012, from you to Justin Osofsky and Douglas	16:07
16	Purdy, among others, you write:	16:07
17	"UPDATE - positive conversation	16:07
18	around reciprocity."	16:07
19	Is that right?	16:07
20	A. Correct.	16:07
21	Q. And reciprocity was an important concept for	16:07
22	Facebook with its partners; right?	16:07
23	A. So, again, I can't reflect on that	16:07
24	generally, but in the case of Amazon, yes.	16:07
25	MR. LOESER: Why don't we take a 10-minute	16:08

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1	break.	16:08
2	THE VIDEOGRAPHER: This marks -- this marks	16:08
3	the end of media No. 4 in the deposition of Jackie	16:08
4	Chang. Going off the record. The time is 4:08.	16:08
5	(Off the record.)	16:08
6	THE VIDEOGRAPHER: This marks the beginning	16:22
7	of media No. 5 in the deposition of Jackie Chang.	16:22
8	We are back on the record. The time is 4:22.	16:22
9	BY MR. LOESER:	16:22
10	Q. Miss Chang, we've talked a lot about the	16:22
11	planning for the rollout of Platform 3, and I want	16:22
12	to make sure the record is clear on what happened in	16:23
13	that planning and after the rollout.	16:23
14	As we saw in the materials we went through,	16:23
15	the new Platform 3 deprecated friends permissions	16:23
16	and read permissions; is that right?	16:23
17	A. Sorry. What are you referencing to? Or am	16:23
18	I supposed to look at a document?	16:23
19	Q. No, you don't need to look at a document. I	16:23
20	just -- we have been through the documents. I just	16:23
21	want to make sure it's clear to the -- clear on the	16:23
22	record that those documents showed that with	16:23
23	Platform 3, friends permissions and read permissions	16:23
24	were deprecated; right?	16:23
25	A. Again, I don't know specifically so whatever	16:23

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1	was reflected in the document.	16:23
2	Q. Okay. And as the documents show as well,	16:23
3	certain apps and partners continued to have access	16:23
4	to these deprecated permissions; right?	16:23
5	MR. FALCONER: Objection. Form.	16:23
6	THE WITNESS: Again, I don't -- I don't	16:23
7	remember where I could say with precise like a	16:23
8	hundred percent certainty. I don't know.	16:24
9	BY MR. LOESER:	16:24
10	Q. But you could say generally that these	16:24
11	friends and read permissions were deprecated?	16:24
12	A. Again, I don't feel comfortable because I	16:24
13	don't remember.	16:24
14	Q. Okay. And the apps and partners that were	16:24
15	given continued access to these permissions fell	16:24
16	into categories, three categories, that you	16:24
17	described in your email and the slide you prepared	16:24
18	on that topic; right?	16:24
19	MR. FALCONER: Objection.	16:24
20	BY MR. LOESER:	16:24
21	Q. Let me remind you what the categories were.	16:24
22	There was nonstandard platform agreements, sensitive	16:24
23	and strategic partners and private APIs.	16:24
24	Do you remember that slide that showed those	16:24
25	categories?	16:24

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1	A.	Yes. I remember the slide.	16:24
2	Q.	Right. And you helped develop those	16:24
3	categories; right?		16:24
4	A.	I don't remember specifically.	16:24
5	Q.	But your email appears to indicate that you	16:24
6	helped to develop those categories; right?		16:24
7	A.	So, again, whatever the email says, but I	16:24
8	don't remember that specific moment in time.		16:25
9	Q.	And Miss Chang, do you know how many total	16:25
10	apps and partners were given continued access to		16:25
11	friends permissions?		16:25
12	A.	No, I don't.	16:25
13	Q.	How about read permissions?	16:25
14	A.	I don't.	16:25
15	Q.	Do you know if there were records kept of	16:25
16	all the apps and partners that were given continued		16:25
17	access to friends and read permissions?		16:25
18	A.	I don't know.	16:25
19	Q.	Who would know that?	16:25
20	A.	I don't -- I don't know.	16:25
21	Q.	Okay. You have no idea?	16:25
22	A.	Not for an individual person, no.	16:25
23	Q.	And so in your work now with academic	16:25
24	partnerships, if you wanted to figure out if an		16:25
25	academic partner had continued access to friends		16:25

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1	permissions, for example, who would you go ask to	16:25
2	find that out?	16:25
3	A. That's not possible.	16:25
4	Q. It's not possible for an academic researcher	16:25
5	to have access to friends permissions?	16:26
6	A. No. We don't offer that through the	16:26
7	researcher API.	16:26
8	Q. And when you were working with other types	16:26
9	of partners, if you wanted to find out if that	16:26
10	partner had access to friends permissions, do you	16:26
11	have any recollection at all as to who you would go	16:26
12	to to find that out?	16:26
13	A. I don't know -- I don't know specifically	16:26
14	off the top of my head. I don't know, but I	16:26
15	don't -- yeah.	16:26
16	Q. So, again, I want to make sure I understand	16:26
17	and use the right terminology. If a developer or	16:26
18	partner continued to have access to deprecated	16:26
19	permissions, does that by definition mean that the	16:26
20	app or partner was whitelisted?	16:26
21	A. Say that again, please.	16:26
22	Q. If a developer or partner continued to have	16:26
23	access to deprecated permissions after Platform 3	16:26
24	was implemented, does that by definition mean that	16:26
25	the app or partner was whitelisted?	16:27

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1	MR. FALCONER: Objection. Form.	16:27
2	THE WITNESS: I don't know.	16:27
3	MR. FALCONER: Go ahead.	16:27
4	THE WITNESS: Sorry. I don't know in	16:27
5	specificity in terms of like what you're referring	16:27
6	to, meaning the technical language, I don't know. I	16:27
7	don't know if it's a whitelist. I don't know.	16:27
8	BY MR. LOESER:	16:27
9	Q. Okay. Do you know if whitelisting is one	16:27
10	way the developer or partner continue to have access	16:27
11	to deprecated permissions, but that there are other	16:27
12	ways as well?	16:27
13	A. I don't know.	16:27
14	Q. And is it your understanding that a partner	16:27
15	that has a private API, and through that private API	16:27
16	gets access to friends permission, is that	16:27
17	considered a whitelist, or is that something	16:27
18	different?	16:27
19	A. So, again, I don't -- I don't remember or	16:27
20	know what that would be.	16:27
21	Q. Okay. Do you know if Facebook whitelisted	16:28
22	certain app developers so that they had continued	16:28
23	access to friends permissions after Platform 3 was	16:28
24	implemented?	16:28
25	A. So, again, I don't remember it so I don't	16:28

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1	know if it could be classified as whitelist.	16:28
2	Q. The term "whitelist" is not one you have	16:28
3	used so frequently that you remember to this day	16:28
4	what it means?	16:28
5	A. No.	16:28
6	Q. Do you have any idea of the process that's	16:28
7	used to determine if an app developer or partner is	16:28
8	whitelisted so that they have continued access to	16:28
9	friends permissions?	16:28
10	A. Yeah. I don't recall it.	16:28
11	Q. Do you know if Facebook keeps records of	16:28
12	whitelisted developers/partners?	16:28
13	A. I don't know.	16:28
14	Q. You have no recollection at all as to	16:28
15	whether that information is collected and maintained	16:29
16	in one place so that someone could easily find out	16:29
17	who are all of the whitelisted partners or	16:29
18	developers?	16:29
19	A. So again --	16:29
20	MR. FALCONER: Asked and answered.	16:29
21	THE WITNESS: -- that's outside my scope, so	16:29
22	I don't know.	16:29
23	BY MR. LOESER:	16:29
24	Q. Now, if we go back to slide -- I'm sorry,	16:29
25	deck -- Exhibit 12 for a minute. And if you look at	16:29

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1	the fourth page "Preparing for the Deprecations."	16:29
2	This indicates that of these categories here, "Pre	16:29
3	Enforce," "Standard" and "Extension," "Exception,"	16:29
4	under "Standard," "apps are notified on P-day," I	16:30
5	assume that is platform day, "and have a certain --	16:30
6	N days to comply"; right?	16:30
7	A. So I don't know.	16:30
8	MR. FALCONER: Objection to form.	16:30
9	BY MR. LOESER:	16:30
10	Q. And then on Extension, that also seems to	16:30
11	indicate that that would last for a certain amount	16:30
12	of time, right, "apps given n + x days to comply";	16:30
13	right?	16:30
14	A. Again, I don't remember.	16:30
15	Q. And then if you look at the last one,	16:30
16	"Exceptions," which your email talked about quite a	16:30
17	bit. Those are -- those grant access to whitelisted	16:30
18	apps and partners indefinitely; is that right? That	16:30
19	means there is no end date that's predetermined;	16:30
20	right?	16:30
21	A. I don't know.	16:30
22	Q. And you have no recollection whatsoever	16:30
23	about which apps or partners fell into each one of	16:30
24	these categories?	16:31
25	A. Correct. I don't remember.	16:31

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1	MR. FALCONER: Derek, you're on mute. I	16:32
2	don't know if you did that on purpose.	16:32
3	MR. LOESER: I did not do that on purpose.	16:32
4	BY MR. LOESER:	16:32
5	Q. So if we can go back to Exhibit 8.	16:32
6	DEPOSITION REPORTER: Excuse me, Counsel,	16:32
7	which exhibit?	
8	MR. LOESER: This is Exhibit 8. This is an	16:32
9	Excel file.	16:32
10	BY MR. LOESER:	
11	Q. I want to make sure I understand. This is	16:32
12	an exhibit of apps that are whitelisted for friends	16:32
13	permission; right? This is attached to a document	16:32
14	that explained that that's what this is.	16:32
15	MR. FALCONER: Objection. Form.	16:32
16	BY MR. LOESER:	16:33
17	Q. I'll just refer -- Exhibit 7 is an email	16:33
18	from KP to, among others, you, and it attaches a	16:33
19	spreadsheet with all apps with friends permissions.	16:33
20	Sorry.	16:33
21	So these are the friends permissions that	16:33
22	are provided. And, again, I just want to make sure	16:33
23	if you have any understanding of what these	16:33
24	different friends permissions, how they operate and	16:33
25	what they provide.	16:33

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```
 1              So if an app -- let's take Socialcam because  16:33

 2    it's short.  If an app has friends_permissions,        16:33

 3    friends_location, friends_videos, friends_photos,      16:33

 4    what does that mean that app can get from Facebook?     16:33

 5         A.   So again, I don't --                          16:33

 6              MR. FALCONER:  Objection.  Form.              16:33

 7              Go ahead.                                     16:33

 8              THE WITNESS:  Sorry.  I don't think -- I      16:33

 9    don't know if that's the document that was being        16:33

10    referenced so I -- and I don't know specifically.       16:33

11    BY MR. LOESER:                                           16:34

12         Q.   Okay.  Do you have any understanding of how   16:34

13    these friends permissions work with any of these        16:34

14    apps or partners?  And, again, looking at Socialcam,    16:34

15    and this is a list of the friends permissions that      16:34

16    Socialcam has.                                           16:34

17              Do you understand what Socialcam can obtain   16:34

18    from the Facebook Graph based upon these                 16:34

19    permissions?                                             16:34

20         A.   No, not specifically.                         16:34

21         Q.   Would it be a fair assumption that if         16:34

22    Socialcam has access to the friends_location API, it    16:34

23    can obtain location about someone's friends from the    16:34

24    Facebook Graph?                                          16:34

25              MR. FALCONER:  Objection.  Form.              16:34
```

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```
 1              THE WITNESS:  So, again, I don't -- I don't   16:34

 2     remember, so I can't assume.                           16:34

 3     BY MR. LOESER:                                         16:34

 4        Q.   Did you have any interaction with a partner    16:35

 5     in a discussion of the information -- the              16:35

 6     permissions the partner was interested in, where       16:35

 7     they said to you, Hey, we want to arrange so that we   16:35

 8     have permission to access friends_video?               16:35

 9        A.   I don't remember specifically like             16:35

10     individual permissions.                                16:35

11        Q.   Okay.  Do you remember any conversations at    16:35

12     all about friends permissions with any partner?        16:35

13        A.   I don't remember specifically anything about   16:35

14     friends permission.                                    16:35

15        Q.   Do you remember anything generally about       16:35

16     friends permissions?  And particularly, I'm asking     16:35

17     if any partner that you have worked with raised that   16:35

18     as a permission that they were interested in gaining   16:35

19     access to.                                             16:35

20        A.   I don't -- I don't -- I don't recall.          16:35

21              MR. LOESER:  Okay.  We can go to Exhibit 21.  16:36

22              (Exhibit 20 marked for identification.)       16:36

23              MR. LOESER:  Oh, is it 20?  Yeah.             16:36

24              While that's being loaded, for the record,    16:36

25     this is an email from Simon Cross to, among others,    16:36
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1	yourself, dated October 24th, 2013, "Subject:	16:37
2	Capabilities tool improvement request - feedback by	16:37
3	end of day Sunday, please." With attachment,	16:37
4	"Capability audit 24 October 2013," attaching an	16:37
5	Excel spreadsheet.	16:37
6	BY MR. LOESER:	16:37
7	Q. Do you see that document, Miss Chang?	16:37
8	A. I see the email, yes.	16:37
9	Q. So this email starts with Mr. Cross saying:	16:37
10	"Hi guys, Over the last few weeks,	16:37
11	you'll have noticed Engineering have	16:37
12	moved many app-based GKs over to the new	16:37
13	Capabilities tool. Going forward, this	16:37
14	tool is going to be a much larger part	16:37
15	of our lives -- it's where the vast	16:37
16	majority of whitelists will be managed.	16:37
17	Platform Simplification is about to	16:37
18	introduce even more whitelists -- such	16:38
19	as allowing apps to be exempt from the	16:38
20	transition to hashed UIDs, or to be	16:38
21	able to continue using read_stream or	16:38
22	friends_permissions."	16:38
23	Did I read that accurately?	16:38
24	A. Yes, you -- yes.	16:38
25	Q. Do you recall receiving this email and the	16:38

1	attachment that it provides?	16:38
2	A. I don't recall it specifically.	16:38
3	Q. Do you recall it at all?	16:38
4	A. No, I don't.	16:38
5	Q. And can you tell me what "app-based GKs"	16:38
6	are?	16:38
7	A. I don't know.	16:38
8	Q. You have no recollection whatsoever?	16:38
9	A. No. Again, I'm not -- I'm not the technical	16:38
10	person, so I just don't -- I don't know technically	16:38
11	what it would mean.	16:38
12	Q. Okay. Do you know what the Capabilities	16:38
13	tool was?	16:38
14	A. Not specifically. I've heard of it, but I	16:38
15	don't know it in detail.	16:39
16	Q. Well, what have you heard about it?	16:39
17	A. It looks like some sort of permissioning	16:39
18	tool.	16:39
19	Q. And what does that mean?	16:39
20	A. It grants permissions.	16:39
21	Q. Who does it grant permissions to?	16:39
22	A. So, again, I don't -- I don't know the	16:39
23	technical specifics, so I don't feel comfortable	16:39
24	talking about it in depth because I might	16:39
25	mischaracterize it.	16:39

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1	Q. Okay. You've said all that you feel	16:39
2	comfortable saying about it?	16:39
3	A. Well, like all that I know about it.	16:39
4	Q. And before I asked you if there was a place	16:39
5	where whitelists were managed, and this seems to	16:39
6	indicate that the Capabilities tool is where the	16:39
7	vast majority of whitelists will be managed.	16:39
8	Does that refresh your recollection about	16:39
9	where whitelists are managed?	16:39
10	A. No.	16:39
11	Q. Okay. And this uses the term "platform	16:40
12	simplification," which previously we saw you were	16:40
13	tasked with various things having to do with	16:40
14	platform simplification.	16:40
15	Can you provide any more information on your	16:40
16	understanding of platform simplification?	16:40
17	MR. FALCONER: Objection. Form.	16:40
18	THE WITNESS: No. Again, this wasn't the	16:40
19	top of like my -- my focus, so I don't really have a	16:40
20	lot of recollection around this.	16:40
21	BY MR. LOESER:	16:40
22	Q. Do you recall that based on the information	16:40
23	that was sent to you here and the description of	16:40
24	this email, there were thousands of different app	16:40
25	developers and partners that had been whitelisted by	16:40

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1	Facebook?	16:40
2	A. I -- I don't know technically.	16:40
3	Q. Do you recall whether you were concerned	16:40
4	about the number of whitelisted partners or app	16:41
5	developers?	16:41
6	A. I don't remember.	16:41
7	Q. And you see in that first paragraph that as	16:41
8	part of platform simplification, there were going to	16:41
9	be even more whitelists? Do you see where it says	16:41
10	that those whitelists, among other things, were	16:41
11	going to allow apps to be exempt from the transition	16:41
12	to hashed UIDs, or to be able to continue using	16:41
13	read_stream or friends_permissions?	16:41
14	So is that indicating to you that these	16:41
15	whitelists were going to extend read and friend	16:41
16	permissions to a number of apps and partners?	16:41
17	A. Can I read -- sorry, can I have one moment	16:41
18	to read? I just haven't had a chance. Are you	16:41
19	looking at the second paragraph?	16:41
20	Q. I'm just looking at the first paragraph	16:41
21	where it says.	16:42
22	A. Okay. Sorry, can you repeat the question?	16:42
23	Q. Yeah, I'm trying to make sure I understand	16:42
24	your knowledge of whitelisting that allowed partners	16:42
25	or apps to continue having access to read_stream or	16:42

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1	friends_permissions.	16:42
2	A. So I --	16:42
3	MR. FALCONER: Objection. Form.	16:42
4	Go ahead.	16:42
5	THE WITNESS: I don't remember enough to be	16:42
6	able to make those conclusions, and I also just	16:42
7	don't know if you're interchanging technical terms	16:42
8	that I can't really speak to.	16:42
9	BY MR. LOESER:	16:42
10	Q. So what was your job in October of 2013?	16:42
11	A. I believe it was partner manager.	16:42
12	Q. And so if you look at the next paragraph it	16:43
13	says:	16:43
14	"Today there are 315 capabilities,	16:43
15	5147 apps and 22,432 capability-app-	16:43
16	pairs in the system. Capabilities	16:43
17	are important -- they expose some of	16:43
18	our most sensitive features, and	16:43
19	additional user data to third-parties."	16:43
20	Do you understand what "capabilities" are?	16:43
21	A. Not in -- not in the technical sense, no.	16:43
22	Q. Do you understand it in any sense?	16:43
23	A. Other than what I said earlier, which is	16:43
24	it's some permissioning tool.	16:43
25	Q. This says:	16:43

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1	"This tool will be the primary way we	16:44
2	manage the private part of platform,	16:44
3	so it should codify our processes and	16:44
4	allow us to manage the risk of	16:44
5	exposing private features/data to	16:44
6	third-party developers."	16:44
7	Do you see that?	16:44
8	A. Yes, I see that.	16:44
9	Q. Now, as the partner manager, were you aware	16:44
10	of that use for capabilities?	16:44
11	A. I'm not sure I understand.	16:44
12	Q. Did you use the capabilities tool at all in	16:44
13	your position at the time?	16:44
14	A. I don't remember. There's a lot of tools,	16:44
15	so I don't remember this one specifically.	16:44
16	Q. So you don't remember the tool that was the	16:44
17	primary way Facebook managed the private part of the	16:44
18	platform so it could "manage the risk of exposing	16:44
19	private features/data to third-party developers"?	16:44
20	MR. FALCONER: Objection. Form.	16:44
21	THE WITNESS: Yes. Again, I don't remember.	16:44
22	MR. LOESER: If we can go to Exhibit 22?	16:45
23	(Exhibit 21 marked for identification.)	16:45
24	MR. FALCONER: This is Exhibit 21; right?	16:46
25	MR. LOESER: Yeah.	16:46

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1	BY MR. LOESER:	16:46
2	Q. Miss Chang, I'm showing you Exhibit 21,	16:46
3	which is an email from Paul Stepnowsky to, among	16:46
4	others, you. This is dated September 3rd, 2019, and	16:46
5	it contains a chat message; is that right?	16:46
6	A. Yes, I see that.	16:46
7	Q. And so in 2019, what was your position at	16:46
8	Facebook?	16:46
9	A. I believe it was product partnerships.	16:46
10	Q. Who is Paul Stepnowsky?	16:46
11	A. I don't remember specifically.	16:46
12	Q. Okay. So on September 3rd of 2019, there	16:46
13	was this chat, and it starts with Paul Stepnowsky	16:47
14	writing, "Hi Eli, Riana and I are working on a	16:47
15	TechCrunch inquiry, asking about a publicly exposed	16:47
16	data set that contains user phone numbers."	16:47
17	Do you -- first of all, is "TechCrunch" a	16:47
18	publication?	16:47
19	A. Yes.	16:47
20	Q. Are you familiar with that publication?	16:47
21	A. I know what it is, yes.	16:47
22	Q. And a "publicly exposed data set that	16:47
23	contains user phone numbers," what does that mean?	16:47
24	A. I don't know.	16:47
25	Q. Do you know what a "publicly exposed data	16:47

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1	set" is?	16:47
2	A. I don't know in this context.	16:47
3	Q. Mr. Stepnowsky writes:	16:47
4	"We are trying to understand the	16:47
5	user_mobile_phone permission. We	16:47
6	understand this permission is	16:47
7	restricted to a limited set of	16:47
8	partners, and we are hoping to learn	16:47
9	a bit more about who is granted this	16:48
10	permission and how they get it."	16:48
11	Do you see that?	16:48
12	A. Yes.	16:48
13	Q. And you see down below, Paul Stepnowsky	16:48
14	adds, "Adding Jackie in case she knows." Right?	16:48
15	A. Yes.	16:48
16	Q. So Mr. Stepnowsky thought that you would be	16:48
17	knowledge about this permission and how a partner	16:48
18	could get it; right?	16:48
19	A. Yes. It seems so.	16:48
20	Q. Down below a little bit, Amit Sangani says,	16:48
21	"This is used for Facebook login. This permission	16:49
22	allows our Facebook login partners --	16:49
23	(Clarification requested by Reporter.)	
24	BY MR. LOESER:	
25	Q. Amit Sangani writes:	

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1   "This is used for Facebook login. This

2   permission allows our Facebook login

3   partners to request phone numbers from   16:49

4   users. Eddie O'Neil, PM Director, is   16:49

5   the owner of this capa."   16:49

6   Do you see that?   16:49

7   A.   Yes.   16:49

8   Q.   And Eddie O'Neil was the product manager   16:49

9 director, is that what that means?   16:49

10   A.   Yes.   16:49

11   Q.   And what does it mean to be the owner -- and   16:49

12 I assume that's capability. What does it mean to be   16:49

13 the "owner of a capability"?   16:49

14   A.   I believe it's your name is mapped to it.   16:49

15   Q.   Okay. And is that because you provided   16:49

16 permission to that partner to use that capability or   16:49

17 you were responsible for creating that capability?   16:49

18   A.   So I don't know enough around the rules for   16:49

19 that to -- I don't know.   16:50

20   Q.   If you look down a little further in the   16:50

21 chat, Mr. Stepnowsky says: 16:50

22   "We are having trouble determining if   16:50

23   the data was obtained from an app."   16:50

24   Can you explain why it would be hard to   16:50

25 determine if data was obtained from an app?   16:50

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1	MR. FALCONER: Objection. Form.	16:50
2	THE WITNESS: So I don't know specifically.	16:50
3	Again, I'm not technical, which is why I believe I	16:50
4	referred to partner engineering.	16:51
5	BY MR. LOESER:	16:51
6	Q. All right. We can run down the chat, to the	16:51
7	next page. Alonso Fernandez Baptista, on September	16:51
8	3rd, 2019, writes:	16:51
9	"In 2011 we opened up the user_mobile_	16:51
10	phone permission to developers, only	16:51
11	to remove it a few days later after	16:51
12	what I assume was negative feedback.	16:51
13	At around Q4 2016 and Q2 2017 we	16:51
14	started whitelisting beta partners to	16:51
15	access user_mobile_phone once again	16:51
16	as we wanted to open it back" up "to	16:51
17	developers. We wanted to get a sense	16:51
18	of how it helped Facebook keep an	16:51
19	updated phone graph, how it helped	16:51
20	developers log people into their	16:51
21	account and how it helped users stay	16:51
22	in touch with businesses that required	16:51
23	their phone."	16:52
24	And then I'm moving forward a bit:	16:52
25	"In Q4 2017 we decided to not open it	16:52

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1	to the public and migrate it into a	
2	capability. All beta testing partners	16:52
3	who were whitelisted were grandfathered	16:52
4	into this capability."	16:52
5	So do you have any understanding at all of	16:52
6	what happened here?	16:52
7	A. Not specifically. I believe at that time, I	16:52
8	was just moving out of Internet.org back into	16:52
9	product partnerships, so I don't -- I don't know the	16:52
10	history of a lot of it.	16:52
11	Q. So is it a fair read to say that this	16:52
12	capability was whitelisted to what I refer to as	16:52
13	"beta partners" and because of that, they were able	16:52
14	to continue using a permission that had been	16:52
15	publicly deprecated?	16:52
16	MR. FALCONER: Objection. Form and	16:52
17	foundation.	16:53
18	THE WITNESS: Again, I don't know the	16:53
19	history, and I don't know like the whole background	16:53
20	that Alonso is providing, so I can't speak on his	16:53
21	behalf.	16:53
22	BY MR. LOESER:	16:53
23	Q. All right. If you go down a bit farther,	16:53
24	Mr. Stepnowsky says:	16:53
25	"Got it. I also think that on the	16:53

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Veritext Legal Solutions
866 299-5127

1	dev website it might be behind a	16:53
2	gatekeeper, so it isn't publicly	16:53
3	accessible."	16:53
4	Can you tell me what it means for a	16:53
5	permission to be behind a gatekeeper?	16:53
6	A. I -- again, a lot of these are very	16:53
7	technically nuanced, so I don't know what the	16:53
8	difference is of them or what they are.	16:53
9	Q. You understand that if a permission or an	16:53
10	API is publicly accessible, that means that anyone	16:53
11	can determine publicly what in it exists?	16:53
12	A. Say that again.	16:53
13	Q. If a developer wants to know what are all	16:53
14	the publicly available APIs, that is something that	16:53
15	they can presumably go online or get from Facebook	16:53
16	from public sources?	16:54
17	A. So they can go to Face- --	16:54
18	developer.Facebook.com. They could read about it	16:54
19	and then they can apply through the developer	16:54
20	platform process.	16:54
21	Q. Okay. And if a -- if a permission is not	16:54
22	publicly available, then an app developer can't --	16:54
23	won't know what those permissions are, absent some	16:54
24	direct discussion with Facebook?	16:54
25	A. So, again, I am not the technical expert	16:54

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1	here, and I don't know in that nuance of how you're	16:54
2	referring if they could be used interchangeably,	16:54
3	meaning permission and whatever else you were	16:54
4	referring to.	16:54
5	MR. LOESER: We can go to the next exhibit.	16:54
6	This should be Exhibit 22 by my count. My tabs are	16:55
7	off now, so I will be making a lot of mistakes, I'm	16:55
8	sure.	16:55
9	MR. FALCONER: They are off by 1. It would	16:55
10	be easier if they were off by like 46.	16:55
11	(Exhibit 22 marked for identification.)	16:55
12	BY MR. LOESER:	16:55
13	Q. Miss Chang, I'm showing you what's been	16:55
14	marked Exhibit 22, which is an email from Simon	16:55
15	Cross to Eddie O'Neil, dated March 27, 2014.	16:55
16	"Subject: Forward: API deprecation," "Attachments:	16:55
17	Events Privatization_2013," and some other letters.	16:56
18	Do you see that?	16:56
19	A. Yes.	16:56
20	Q. And the email below that indicates that	16:56
21	there's a thread about "Events API deprecation."	16:56
22	A. Can I read that?	16:56
23	Q. Sure.	16:56
24	A. Thank you. Okay.	16:57
25	Q. Miss Chang, this is another email thread	16:57

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1	about deprecations of certain permissions in	16:57
2	connection with the new platform. And do you see	16:57
3	the reference to -- well, let's look at the email at	16:57
4	the top. It says:	16:57
5	"Here's the whole thread about	16:57
6	Events API deprecation. Given the	16:57
7	other stuff, I guess we need to tell	16:57
8	them we should NOT deprecate the	16:57
9	Events API at F8. Concur?"	16:57
10	Do you see that?	16:57
11	A. Yes.	16:57
12	Q. And then in the email below from you to	16:58
13	Aditya Koolwal and Simon Cross, among others, dated	16:58
14	March 24, 2014, "Subject: Re: API deprecation," you	16:58
15	provide some fairly specific information about the	16:58
16	topic of API deprecation; is that right?	16:58
17	A. Yes.	16:58
18	Q. Okay. So this shows your involvement in	16:58
19	this -- in this task of sorting out API removals;	16:58
20	right?	16:58
21	A. Yes, but I don't recall specifically.	16:58
22	Q. Okay. And it looks like you did some pretty	16:58
23	detailed work here. You say that you, "synced up	16:58
24	with Simon and we agree with the API removal list	16:58
25	you outlined. I went ahead and cleaned up the list	16:58

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1	of APIs for removal and outlined the API calls in	16:58
2	the attached. Could you look over and verify that	16:59
3	it's all correct as Simon is going to translate this	16:59
4	into a task for engineering? Additionally, can you	16:59
5	provide some additional clarifications/confirmations	16:59
6	for the below:"	16:59
7	Did I read that correctly?	16:59
8	A. Yes.	16:59
9	Q. Can you read your first bullet there in your	16:59
10	email.	16:59
11	A. "Since some partners (i.e. Mobile)	16:59
12	require access to APIs beyond the	16:59
13	12 month outlined for PS12N, do you	16:59
14	want to privatize these APIs instead	16:59
15	of maintain them as capabilities?	16:59
16	This will allow us maintain access to	16:59
17	a few devs while publicly deprecating	16:59
18	it."	16:59
19	Q. So can you explain what you are describing	16:59
20	here?	16:59
21	A. I don't remember in detail where -- it would	16:59
22	be hard for me to explain in detail. I don't know.	17:00
23	Q. Okay. So what you say here is that -- and	17:00
24	again, this appears to be part of the process of	17:00
25	deprecating permissions when Facebook transitioned	17:00

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1	to the new platform; right, which it looks like you	17:00
2	were involved in a lot of ways in that process.	17:00
3	Another one concerns this API removal list; right?	17:00
4	MR. FALCONER: Objection. Form.	17:00
5	THE WITNESS: So I don't know, but, yeah, I	17:00
6	see the email.	17:00
7	BY MR. LOESER:	17:00
8	Q. Okay. And this suggests that -- that "some	17:00
9	partners require access to APIs beyond 12 months	17:00
10	outlined for PS12N."	17:00
11	And so as you recall, when we went through	17:00
12	the different categories of partners that were	17:00
13	getting extended permissions, some were extended	17:00
14	permissions for a limited amount of time and some	17:00
15	were extended permissions indefinitely; right?	17:00
16	A. Sorry. In that -- in that PowerPoint slide?	17:01
17	Q. Right.	17:01
18	A. Yes, I remember the PowerPoint slide.	17:01
19	Q. Okay. So this appears to be indicating that	17:01
20	Mobile as private -- because Mobile requires access	17:01
21	beyond 12 months, that your idea was to privatize	17:01
22	those apps so that their access to these deprecated	17:01
23	permissions would not end in 12 months; is that	17:01
24	right?	17:01
25	A. So I don't remember specifically, but --	17:01

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1	yes, it seems like I'm posing the question.	17:01
2	Q. So, certainly, as of the date of this email,	17:01
3	March 24, 2014, you knew that there would be some	17:02
4	partners that would require access to deprecated	17:02
5	APIs for more than 12 months after the new platform	17:02
6	was introduced; right?	17:02
7	A. So I don't know, at that moment in time.	17:02
8	Q. So looking at what you wrote, you're telling	17:02
9	me you can't determine, based on what you wrote,	17:02
10	that there were some partners that would require	17:02
11	access to APIs beyond the 12 months outlined for	17:02
12	PS12N?	17:02
13	A. I know what I wrote, but I don't remember it	17:02
14	in specificity where I would know the full context	17:02
15	of what you're implying.	17:02
16	Q. Okay. Do you have any reason to believe	17:02
17	that the information that you wrote in this email is	17:02
18	inaccurate?	17:02
19	A. I don't know.	17:02
20	Q. You don't have any reason to believe that,	17:02
21	do you?	17:02
22	A. I mean, there's always a possibility of	17:02
23	inaccuracy, but I don't know. It's not my intent to	17:02
24	be inaccurate.	17:03
25	Q. Did you have any involvement at any point in	17:03

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1	your career at Facebook with screening third-party	17:03
2	developers before -- well, strike that.	17:03
3	Do you know whether Facebook screened	17:03
4	third-party developers or their apps before granting	17:03
5	them access to Graph API?	17:03
6	A. I --	17:03
7	MR. FALCONER: Object to form.	17:03
8	THE WITNESS: Sorry. I don't understand.	17:03
9	Can you give me an example.	17:04
10	BY MR. LOESER:	17:04
11	Q. Sure. Let me ask again. Do you know	17:04
12	whether Facebook screens apps or developers before	17:04
13	allowing them to access the Facebook Graph?	17:04
14	MR. FALCONER: Objection. Form.	17:04
15	Go ahead.	17:04
16	THE WITNESS: So we have like a public	17:04
17	workflow that has a developer operations team that	17:04
18	reviews the apps, so I don't -- I don't know if	17:04
19	that's what you're referring to.	17:04
20	BY MR. LOESER:	17:04
21	Q. And do you know anything about the process	17:04
22	for reviewing apps, how that's done?	17:04
23	A. Not in detail.	17:04
24	Q. Do you know if that process changed after	17:04
25	2012?	17:04

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 1        A.    So I can't really speak to that process.  I   17:04

 2   don't know.                                                 17:04

 3        Q.    Do you know if Facebook reviewed privacy         17:04

 4   policies of third-party apps to ensure that they            17:05

 5   complied with Facebook's own policies before                17:05

 6   providing those apps access to Facebook Graph?              17:05

 7             MR. FALCONER:  Objection.  Form.                  17:05

 8             THE WITNESS:  Sorry.  Can you say that            17:05

 9   again?                                                      17:05

10   BY MR. LOESER:                                              17:05

11        Q.    Do you know if Facebook reviewed the privacy 17:05

12   policies of third-party apps?                               17:05

13        A.    I -- I don't know.                               17:05

14             MR. FALCONER:  Objection.                         17:05

15             THE WITNESS:  I'm sorry.                          17:05

16             MR. FALCONER:  Yeah.  Just same objection.    17:05

17   BY MR. LOESER:                                              17:05

18        Q.    Are you familiar with the Facebook data use  17:05

19   policy?                                                     17:05

20        A.    Not in -- not -- not specifically.  I guess  17:05

21   it's in what context?                                       17:05

22        Q.    Well, have you ever read any version of        17:05

23   Facebook's data use policies?                               17:06

24        A.    So I don't remember that specifically, but   17:06

25   if you're talking about like a -- like a platform       17:06
```

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1	usage, I mean, I know we have platform terms.	17:06
2	Q. Well, do you -- have you ever reviewed	17:06
3	Facebook's platform policies, platform developer	17:06
4	policies?	17:06
5	A. I mean, I have read it, but I don't remember	17:06
6	all the details of it.	17:06
7	Q. And what about the Facebook data use	17:06
8	policies specifically? Is that something you recall	17:06
9	ever reading?	17:06
10	A. I don't remember.	17:06
11	Q. During all your time working with Facebook	17:06
12	partners, did you ever become aware of any violation	17:06
13	of Facebook policies by any app developer or	17:06
14	partner?	17:06
15	A. Sorry. In what sense?	17:06
16	Q. In any sense.	17:06
17	A. I mean, I've heard that it's happened, but I	17:06
18	don't recall anything specific.	17:07
19	Q. Can you recall any specific instance of a	17:07
20	partner with whom you worked violating any Facebook	17:07
21	platform policy?	17:07
22	A. Again, I don't remember specifically but,	17:07
23	yeah, it's definitely possible.	17:07
24	Q. But you never saw it happen; is that what	17:07
25	you are saying?	17:07

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1	A. I don't remember. I don't remember every	17:07
2	instance of my interactions so I don't know.	17:07
3	Q. And there was no platform policy violation	17:07
4	of any partner with whom you worked that you can	17:07
5	specifically recall?	17:07
6	A. Not specifically.	17:07
7	Q. Do you remember generally any platform	17:07
8	violations by any of the partners with whom you	17:07
9	worked?	17:07
10	A. I know that platform violations is possible,	17:07
11	but I don't know specifically who or what.	17:07
12	Q. Are you aware that the data use policy has a	17:08
13	provision that states, "If an application asks	17:08
14	permission from someone else to access your	17:08
15	information, the application will be allowed to use	17:08
16	that information only in connection with the person	17:08
17	that gave the permission and no one else"?	17:08
18	MR. FALCONER: Objection. Form.	17:08
19	THE WITNESS: I don't know that line	17:08
20	specifically off the top of my head. So I'll --	17:08
21	assuming if you're reading it from an actual thing,	17:08
22	yeah, that's --	17:08
23	BY MR. LOESER:	17:08
24	Q. And did you observe any situation in which	17:08
25	that specific policy I mentioned was violated by any	17:08

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1	app or partner?	17:08
2	MR. FALCONER: Objection. Form.	17:08
3	THE WITNESS: So I don't remember.	17:08
4	MR. LOESER: It we can go to tab 25.	17:09
5	(Exhibit 23 marked for identification.)	17:09
6	BY MR. LOESER:	17:09
7	Q. Miss Chang, I'm showing you what's been	17:09
8	marked Exhibit 23, which is an email from you to	17:10
9	Eddie O'Neil, Marie Hagman and Simon Cross, dated	17:10
10	November 21, 2013, "Subject: Capability	17:10
11	Requirements Post-PS12n & privatization" and there	17:10
12	is an attachment "Capability_Legal&Privacy."	17:10
13	Do you see that?	17:10
14	A. Yes.	17:10
15	Q. And so you wrote an email and you provided	17:10
16	an attachment specifically regarding "Capability	17:10
17	Requirements post-PS12n & privatization."	17:10
18	And take a minute to look at your email and	17:10
19	tell me if you recall what you are referring to in	17:10
20	the subject line of this email.	17:10
21	A. Sorry. I'm pulling up the document. Okay.	17:10
22	Q. So I'm looking at the subject of your email	17:12
23	that you wrote, "Capability requirements post-PS12n	17:12
24	& privatization."	17:12
25	Do you understand what that refers to?	17:12

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1   A.   Not specifically, but I -- I see the email.   17:12

2   Q.   Okay. And do you remember your role in   17:13

3 coming up with a new process for capabilities?   17:13

4   A.   I don't remember. I would say there's been   17:13

5 a lot of processes through the years. They blend   17:13

6 together so I don't remember this one specifically.   17:13

7   Q.   Okay. So let's go through your email. You   17:13

8 start: 17:13

9   "I went through a review with the   17:13

10   privacy XFN, legal, and policy team   17:13

11   this week and have agreed upon the   17:13

12   new process for capabilities."   17:13

13   So that's work that you did collecting   17:13

14 information from these other groups; is that right?   17:13

15   A.   No. It sounds like I reviewed with those   17:13

16 groups and have aggregated their feedback.   17:13

17   Q.   Okay. And then your next sentence says: 17:13

18   "Attached are supporting slides for   17:13

19   my findings and recommendations   17:13

20   around the capability creation and   17:13

21   approval process post-PS12n and (2)   17:14

22   privatization of existing APIs.   17:14

23   Below are the key points." [As read.]   17:14

24   So this email presents the -- your findings   17:14

25 and recommendation around those two topics based   17:14

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1	upon your review with the privacy, XFN, legal and	17:14
2	policy team; is that right?	17:14
3	A. I believe so, but I -- again, I don't	17:14
4	remember this specifically.	17:14
5	Q. Okay. So at the time that you wrote this	17:14
6	email, you appeared to have a good understanding of	17:14
7	capability, creation and approval process post-PS12N	17:14
8	& privatization of existing apps; is that right?	17:14
9	A. I wouldn't assume that.	17:14
10	Q. You wouldn't assume you had a good	17:14
11	understanding, even though in this email you present	17:14
12	your findings and recommendations regarding those	17:14
13	topics?	17:14
14	A. Correct. I wouldn't assume that because I'm	17:14
15	working with many different groups, so I'm usually	17:14
16	aggregating knowledge across, so I would not say I	17:14
17	am the expert.	17:14
18	Q. Okay. But they were your findings and your	17:14
19	recommendations; is that right?	17:15
20	A. Based off of what I collected at the time.	17:15
21	Q. Your first key point here -- by the way,	17:15
22	reviewing this email, do you recall what the -- what	17:15
23	is referenced by post-PS12N?	17:15
24	A. Looking at that now, and I think you've been	17:15
25	pointing out platform simplification, I do connect	17:15

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1	the two now.	17:15
2	Q. Okay. And you were very involved in tasks	17:15
3	relating to platform simplification; right?	17:15
4	A. I wouldn't assume that.	17:15
5	Q. You were involved enough to be responsible	17:15
6	for aspects of platform simplification; right?	17:15
7	A. I wouldn't assume that.	17:15
8	Q. Even for --	
9	A. Being I supported -- I supported the work	17:15
10	stream, but I can't characterize because I don't	17:15
11	remember if that was my position, so that's why I	17:15
12	wouldn't assume that.	17:15
13	Q. But we have looked at email where you were	17:15
14	assigned a particular task with regard to platform	17:16
15	simplification; right?	17:16
16	A. So assigning to task doesn't mean I -- I own	17:16
17	that.	17:16
18	Q. What does it mean?	17:16
19	A. It means I'm assigned to task.	17:16
20	Q. Having been assigned the task, presumably	17:16
21	you learned something about it?	17:16
22	A. I guess. But, again, I don't know from that	17:16
23	moment in time. It's 2013, so I don't remember at	17:16
24	that moment in time.	17:16
25	Q. Okay. Well, let's look at what your key	17:16

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1	points were in your findings and recommendations.	17:16
2	The first one was:	17:16
3	"Capability creation should not be	17:16
4	gated by approval. We should put	17:16
5	the same requirements/trust as we	17:16
6	do with GK - this will ensure the	17:16
7	most optimal adoption by engineering."	17:16
8	What did you mean by that?	17:16
9	A. Again, I don't know.	17:17
10	Q. No memory whatsoever of what that finding	17:17
11	and recommendation meant?	17:17
12	A. I don't know between capability and GK how	17:17
13	it's blended, where I -- I don't know -- like I	17:17
14	don't recall enough between the two, the	17:17
15	differences.	17:17
16	Q. Okay. And what is "GK"?	17:17
17	A. Gatekeeper.	17:17
18	Q. Okay. And then, in your second key point	17:17
19	from your findings and recommendations you state:	17:17
20	"Capabilities fall into two major	17:17
21	buckets: Internally-used and	17:17
22	externally-used." [As read.]	17:17
23	Do you recall dividing capabilities into	17:17
24	those two buckets?	17:17
25	A. I don't remember.	17:17

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```
 1        Q.   Do those -- do capabilities fall into those   17:17
 2    two buckets?                                           17:17
 3        A.   I don't know generally for them, but what it  17:17
 4    says in the email is what it says.  But I don't -- I   17:17
 5    don't know if that's -- I don't know enough to know    17:17
 6    if that classification is true.                        17:17
 7        Q.   But, presumably, when you wrote this email,   17:17
 8    you believed that that was true; right?                17:18
 9        A.   I don't know.                                 17:18
10        Q.   Okay.  You might have written an email in     17:18
11    which you had no idea whether that information was     17:18
12    true or not?                                           17:18
13        A.   Again, I don't know.  I don't remember that,  17:18
14    so I don't want to make assertions for a moment in     17:18
15    time that I can't remember.                            17:18
16        Q.   Okay.  But it would be pretty unusual, don't  17:18
17    you think, for you to write an email in which you      17:18
18    make knowingly untrue assertions?                      17:18
19        A.   I wouldn't position it that way because this  17:18
20    stuff is highly technical, so I think there's a high   17:18
21    possibility for me not to know at all -- to all        17:18
22    extent to say that it's completely true.               17:18
23        Q.   So any email we pick up from this time        17:18
24    period, maybe everything you said was wrong, maybe     17:18
25    right.  What I am asking is:  You wouldn't knowingly   17:18
```

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1	present false information; right?	17:18
2	A. Not to my -- yeah, I wouldn't -- if I knew,	17:18
3	I wouldn't make an assertion.	17:18
4	Q. So if you could read what you've written for	17:18
5	"externally-used" down after your description of	17:19
6	"Capabilities falling into two major buckets," your	17:19
7	second bucket is "externally-used," and if you go	17:19
8	down to that bullet, could you read that bullet?	17:19
9	A. "Externally-Used: These capabilities	17:19
10	generally break out to" -- "breakout to	17:19
11	user (i.e. Autogrants) and non-user	17:19
12	functionality (i.e. Unlimited API	17:19
13	calls). They are typically riskier	17:19
14	because we're putting a lot of trust	17:19
15	into the hands of developers and	17:19
16	hoping they understand the intended	17:19
17	use and never alter the experience	17:19
18	without our approval."	17:19
19	Q. And what did you mean by -- explain what you	17:19
20	meant by that sentence.	17:19
21	A. Again, I don't remember in that specific	17:19
22	moment, so I don't -- I -- I don't know enough to be	17:20
23	able to -- to interpret that.	17:20
24	Q. So as you sit here today, reading this	17:20
25	language means nothing to you?	17:20

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1	A. A lot of it doesn't look familiar.	17:20
2	Q. I asked you if it meant anything to you.	17:20
3	Can you discern the meaning of what you wrote when	17:20
4	you wrote this email describing the externally-used	17:20
5	capabilities?	17:20
6	A. I can't because a lot of things aren't that	17:20
7	familiar, which would require me to assume and	17:20
8	speculate about things.	17:20
9	Q. So at the time that you wrote this email, as	17:20
10	the email reflects, you went through a review with	17:20
11	privacy, XFN, legal and the policy team, and you	17:20
12	made these recommendations.	17:20
13	So fair to say that when you wrote this	17:20
14	email, you had an adequate understanding of the	17:20
15	topics that you were discussing in this email?	17:21
16	A. I -- I don't know.	17:21
17	Q. If you read further down your key points,	17:21
18	the fourth one is, "Capabilities meant to support	17:21
19	external apps," and you write, "Capabilities meant	17:21
20	to support external apps should," and could you read	17:21
21	that first bullet, please?	17:21
22	A. "Should ALWAYS require an agreement/	17:21
23	light-weight confirmation. Depending	17:21
24	on how strategic or data sensitive the	17:21
25	capability, we will require the	17:21

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1	appropriate coverage. At the very	17:21
2	least, this will put adequate notice	17:21
3	for developers that (1) capabilities	17:21
4	can go away at any time, (2) you	17:21
5	cannot launch without our approval,	17:21
6	and (3) you cannot materially change	17:22
7	your integration without our approval."	17:22
8	Q. So what did you mean when you said	17:22
9	"depending on how strategic or data sensitive the	17:22
10	capability, we will require the appropriate	17:22
11	coverage"?	17:22
12	A. So I don't remember -- I don't remember at	17:22
13	that time what that would be inferring to.	17:22
14	Q. As you sit here today, reading the words	17:22
15	that you wrote, can you understand how the -- how	17:22
16	strategic or data sensitive the capability, how that	17:22
17	would relate to whether you need appropriate	17:22
18	coverage?	17:22
19	A. So, again, over time, my -- my	17:22
20	understanding, things have changed. So I don't feel	17:22
21	comfortable saying that I know what it meant back	17:22
22	then.	17:22
23	And looking at it now, I would say	17:22
24	"strategic" just means, you know, of strategic	17:22
25	value, but I don't know specifically what the	17:22

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1	criteria would be.	17:22
2	Q. And what is -- what do you mean by "how data	17:22
3	sensitive the capability"? What does that pertain	17:22
4	to?	17:22
5	A. Again, I don't know.	17:22
6	Q. Would that suggest that some capabilities	17:23
7	provide access to more sensitive information than	17:23
8	other capabilities?	17:23
9	A. So that would require me to assume. I don't	17:23
10	know.	17:23
11	Q. So, again, we're looking at another document	17:23
12	in which you're providing a recommendation about a	17:23
13	subject on which it appears you did a fair amount of	17:23
14	work, but sitting here today, you have utterly no	17:23
15	understanding of what you wrote.	17:23
16	A. Correct.	17:23
17	MR. FALCONER: Objection to form.	17:23
18	THE WITNESS: I mean, it was in 2013. I	17:23
19	worked on a lot of projects, so I don't remember	17:23
20	this in specificity.	17:23
21	BY MR. LOESER:	17:23
22	Q. And, then, if you look down to paragraph 5,	17:23
23	you write:	17:23
24	"For APIs becoming privatized, Aldo	17:23
25	King would like to run a personal	17:23

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1	review of these and help us determine	17:23
2	if we should require a new confirmation	17:23
3	from devs that we're granting these	17:23
4	capabilities to."	17:24
5	So do you recall what you meant by "APIs	17:24
6	becoming privatized"?	17:24
7	A. If an API became private -- from public to	17:24
8	private.	17:24
9	Q. Yeah. These are your words that you wrote,	17:24
10	so do you have an understanding of what that means?	17:24
11	A. Not in the context of that time because I	17:24
12	don't remember at that very moment.	17:24
13	Q. Well, what would it mean to you today?	17:24
14	A. From public to private.	17:24
15	Q. And what does that mean?	17:24
16	A. If it was a public API and now it's private	17:24
17	API.	17:24
18	Q. And why did APIs become private?	17:24
19	A. I don't know.	17:24
20	Q. Despite your work in this area, you have no	17:24
21	recollection whatsoever about why certain partners	17:24
22	entered into private APIs with Facebook?	17:24
23	A. No. I can't generalize across the board, so	17:24
24	I don't know.	17:25
25	Q. I'm not asking you to generalize across the	17:25

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1	board. I'm asking if you have any understanding at	17:25
2	all.	17:25
3	MR. FALCONER: Objection. Form.	17:25
4	THE WITNESS: Again, I don't remember, so I	17:25
5	don't -- I can't really speak to it.	17:25
6	BY MR. LOESER:	17:25
7	Q. So if someone called you up today and said,	17:25
8	Miss Chang, can you explain to me what the	17:25
9	difference between a private and a public API is,	17:25
10	and why a Facebook partner would have a private API,	17:25
11	you have no answer that you could provide?	17:25
12	A. Correct. I would -- I don't know because	17:25
13	there is a lot of technical nuance, and I don't know	17:25
14	what it would mean today.	17:25
15	Q. And you don't know what it would mean today	17:25
16	and you don't know what it meant in 2013; right?	17:25
17	A. I don't remember.	17:25
18	Q. And the email outlining your findings and	17:25
19	recommendations, based upon all the work you did to	17:25
20	develop them, doesn't refresh your recollection in	17:25
21	any way as to what that term means?	17:25
22	MR. FALCONER: Objection. Form.	17:26
23	THE WITNESS: Yes, it doesn't. Again, this	17:26
24	wasn't -- this wasn't really like my -- I didn't	17:26
25	really recall a lot around this because it wasn't my	17:26

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1	main thing I was focused on, so I -- I just don't	17:26
2	recall a lot of it.	17:26
3	BY MR. LOESER:	17:26
4	Q. So, Miss Chang, it appears from the email	17:26
5	that we went through that you were involved with	17:26
6	deprecating -- working with partners for whom	17:26
7	friends and reads permissions were deprecated over	17:26
8	the course of a couple of years. And based on your	17:26
9	testimony today, it sounds like you have no	17:26
10	recollection of any of those efforts,	17:26
11	notwithstanding working on those matters for a	17:26
12	couple of years. Can you explain that?	17:26
13	A. So I wouldn't --	17:26
14	MR. FALCONER: Objection to form.	17:26
15	THE WITNESS: So I wouldn't generalize it to	17:26
16	that. So as you said, it's been over like -- it's	17:26
17	been over eight years, so I don't remember that.	17:26
18	I've worked on a lot of different projects, a lot of	17:26
19	them blend together, so I don't remember this	17:27
20	specifically.	17:27
21	BY MR. LOESER:	17:27
22	Q. Deprecating friends permissions was a pretty	17:27
23	big deal for Facebook, wasn't it?	17:27
24	A. I don't know.	17:27
25	Q. At the keynote address of the F8 that	17:27

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1	year -- the F8 is a big deal, isn't it?	17:27
2	A. The event is.	17:27
3	Q. Yeah. And Mark Zuckerberg gave the keynote	17:27
4	address in 2014; right?	17:27
5	A. Like we saw, yes.	17:27
6	Q. And that's a big deal; right?	17:27
7	A. I -- I don't know if it was back then.	17:27
8	Q. Okay. And in his keynote address, one of	17:27
9	the things he talked about was deprecating friends	17:27
10	permissions; right?	17:27
11	A. I don't know if he used those words exactly,	17:27
12	but whatever the video said.	17:27
13	Q. Okay. What the video said is that Facebook	17:27
14	was going to stop sharing friends data; right?	17:27
15	A. If that's what the video said. I don't	17:27
16	remember it specifically.	17:27
17	Q. We just watched the video, Miss Chang.	17:27
18	A. Right, but I didn't memorize --	17:27
19	MR. FALCONER: Objection. Argumentative.	17:28
20	BY MR. LOESER:	17:28
21	Q. Okay. So you can't remember what	17:28
22	Mr. Zuckerberg said in the video clip that we showed	17:28
23	you a couple hours ago?	17:28
24	A. Not exactly.	17:28
25	Q. Okay. And we went through the transcript --	17:28

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1	A. We can play it again, I guess.	17:28
2	Q. I read the transcript to you. And in the	17:28
3	transcript, Mr. Zuckerberg says that Facebook was	17:28
4	going to stop letting apps access the content	17:28
5	information of a person's friends who didn't use the	17:28
6	app; right?	17:28
7	A. Is that an exact -- is that an exact	17:28
8	reading? I don't know.	17:28
9	Q. Okay. So that's all --	17:28
10	A. I --	17:28
11	Q. None of that made any sense to you	17:28
12	whatsoever?	17:28
13	A. Again, I don't know if that was specifically	17:28
14	how he said, so I think you've been using things	17:28
15	interchangeably where I don't feel comfortable	17:28
16	agreeing to that. So I don't know what was exactly	17:28
17	said. I don't have the transcript in front of me to	17:28
18	be able to say that's exactly what he said.	17:28
19	Q. Well, fortunately, we have the transcript as	17:28
20	an exhibit. So why don't we go back to that	17:28
21	exhibit.	17:29
22	DEPOSITION REPORTER: Counsel, I don't think	17:29
23	you actually marked the transcript.	17:29
24	MR. LOESER: I think it is Exhibit 17.	17:29
25	DEPOSITION REPORTER: Okay. It is. You're	17:29

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1	right. I apologize.	17:29
2	BY MR. LOESER:	17:29
3	Q. If you look at that second highlighted	17:29
4	paragraph. Why don't you read that again,	17:29
5	Miss Chang.	17:30
6	A. "And in the past, when one of your	17:30
7	friend" --	17:30
8	Q. Go ahead. Sorry.	17:30
9	A. "And in the past, when one of your	17:30
10	friend blogged into an app, in this	17:30
11	case, Ilya, the app could ask him	17:30
12	not only to share his data, but also	17:30
13	data that his friends had shared	17:30
14	with him -- like photos and friend	17:30
15	lists here. So now we're going to	17:30
16	change this, and we're going to make	17:30
17	it so that now everyone has to choose	17:30
18	to share their own data with an app	17:30
19	themselves.	17:30
20	"So we think that this is a really	17:30
21	important step for giving people power	17:30
22	and control over how they share their	17:30
23	data with the apps. And as developers,	17:30
24	this is going to allow you to keep	17:31
25	building apps with all the same great	17:31

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1	social features while also giving	17:31
2	people power and control first. So	17:31
3	I am really happy that we're doing	17:31
4	this."	17:31
5	Q. Now, I want to make sure that you understand	17:31
6	what he said here because this is something that	17:31
7	Mr. Zuckerberg included in his keynote address. And	17:31
8	as he says, he was really happy they were doing	17:31
9	this, and the "this" was eliminating friend sharing;	17:31
10	right? Is that -- is that a description that you	17:31
11	agree with?	17:31
12	A. No, I --	17:31
13	MR. FALCONER: Object. Foundation.	17:31
14	THE WITNESS: No. I don't know if it's	17:31
15	specifically related to that. I can't assume that.	17:31
16	BY MR. LOESER:	17:31
17	Q. Okay. Let's read a sentence and see if we	17:31
18	can develop a common understanding.	17:31
19	"So now we're going to change this	17:31
20	and we're going to make it so that	17:32
21	now everyone has to choose their own	17:32
22	data with a" -- I'm sorry, "That now	17:32
23	everyone has to choose to share their	17:32
24	own data with an app themselves."	17:32
25	Do you understand what that means?	17:32

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1	A. Yes.	17:32
2	Q. What does that mean?	17:32
3	A. It means that people have to opt in to share	17:32
4	information. So if they publish something, they	17:32
5	have to opt in to do that.	17:32
6	Q. So that means that if one person downloads	17:32
7	an app, that app can't get access to that person's	17:32
8	friends, unless those friends also opt into that	17:32
9	sharing; is that right?	17:32
10	A. So I don't know specifically if it means to	17:32
11	that.	17:32
12	Q. Okay. So, Miss Chang, all that work you did	17:32
13	over at least a year period figuring out which	17:32
14	partners were going to get continued access to	17:32
15	friend sharing, are you telling the jury that you	17:32
16	don't have any understanding of what that would	17:33
17	enable those partners to continue doing?	17:33
18	MR. FALCONER: Objection. Form and	17:33
19	foundation.	17:33
20	THE WITNESS: So, again, I wasn't just	17:33
21	working on that. It would -- sounded like it was	17:33
22	working on a lot of different capabilities, so I	17:33
23	don't remember that specifically and how you're	17:33
24	positioning that.	17:33
25	/ / /	17:33

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1	BY MR. LOESER:	17:33
2	Q. Do you remember at all when you were working	17:33
3	to develop a format for what partners would continue	17:33
4	having access to friend sharing -- so stop there.	17:33
5	Do you remember that at all?	17:33
6	A. No, beyond what we were just reading earlier	17:33
7	today.	17:33
8	Q. Okay. And what we were reading earlier	17:33
9	today showed your involvement in developing that	17:33
10	format; right?	17:33
11	A. That's -- that's what the email -- if that's	17:33
12	what the email said, yeah.	17:33
13	Q. And so when Mr. Zuckerberg stood up and gave	17:33
14	this presentation and he touched on a topic on which	17:33
15	you had been working for over a year, you don't have	17:33
16	any recollection of noticing that?	17:33
17	A. I don't know if he's specifically referring	17:34
18	to what I am working on.	17:34
19	Q. Well, he was specifically referring to	17:34
20	getting rid of the ability of apps to access friend	17:34
21	permissions; right?	17:34
22	MR. FALCONER: Objection. Form and	17:34
23	foundation.	17:34
24	THE WITNESS: I don't believe that's what he	17:34
25	said. He said:	17:34

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1	"So now we're going to change this	17:34
2	and we're going to make it so that	17:34
3	everyone has to choose to share	17:34
4	their own data with an app	17:34
5	themselves."	17:34
6	BY MR. LOESER:	17:34
7	Q. So, Miss Chang, how do you think Facebook	17:34
8	made that change? What do you think they did?	17:34
9	MR. FALCONER: Objection. Form.	17:34
10	THE WITNESS: They changed the permissioning	17:34
11	model, I'm guessing.	17:34
12	BY MR. LOESER:	17:34
13	Q. Right. Doesn't that mean that they	17:34
14	eliminated the friend sharing APIs? Isn't that what	17:34
15	he's saying?	17:34
16	A. I don't --	17:34
17	MR. FALCONER: Objection to form and	17:34
18	foundation.	17:34
19	BY MR. LOESER:	17:34
20	Q. Right?	17:34
21	A. So, again, I don't know specifically because	17:34
22	I think you're referring to one thing and I don't	17:35
23	know.	17:35
24	Q. Okay. So looking at this language, you	17:35
25	don't draw any line between making it so everyone	17:35

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1	has to choose to share their own data with an app	17:35
2	themselves; you draw no connection in your mind	17:35
3	between that and eliminating friend sharing?	17:35
4	A. Again, I don't know what Mark is	17:35
5	specifically referring to, so I can't make that	17:35
6	assumption or connection.	17:35
7	Q. And having gone through all these emails	17:35
8	that we went through and looking at this language,	17:35
9	you still can't make that connection?	17:35
10	A. I can't.	17:35
11	MR. FALCONER: Derek, we have been going a	17:35
12	little more than an hour. Whenever you hit a	17:36
13	stopping point, can we take a break?	17:36
14	MR. LOESER: Now is fine.	17:36
15	THE VIDEOGRAPHER: This marks the end of	17:36
16	media No. 5 in the deposition of Jackie Chang.	17:36
17	Going off the record. The time is 5:36.	17:36
18	(Off the record.)	17:36
19	THE VIDEOGRAPHER: This marks the beginning	17:56
20	of media No. 6 in the deposition of Jackie Chang.	17:56
21	We are back on the record. The time is 5:57.	17:57
22	BY MR. LOESER:	17:57
23	Q. Miss Chang, before we were talking about the	17:57
24	2014 F8 Conference and I want to make sure I	17:57
25	understand your testimony. Do you generally attend	17:57

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1	the F8 Conferences?	17:57
2	A. Not generally. I've been to them, but I	17:57
3	haven't been to all.	17:57
4	Q. And do -- you generally just don't have much	17:57
5	of a role there, so you can't remember much about	17:57
6	it?	17:57
7	A. That depends on which F8. I've spoken at F8	17:57
8	before.	17:57
9	Q. What are the topics on which you've spoken?	17:57
10	A. On Internet.org.	17:57
11	Q. Okay. And what year? Do you recall what	17:57
12	year that was?	17:57
13	A. I don't remember what year exactly.	17:57
14	MR. LOESER: We're going to show you the	17:57
15	next exhibit, which should be -- I know I'm going to	17:57
16	say it wrong, but I think it is Exhibit 24.	17:57
17	(Exhibit 24 marked for identification.)	17:58
18	BY MR. LOESER:	17:58
19	Q. Miss Chang, you should be looking at	17:58
20	Exhibit 24, which is an email from KP to Simon	17:58
21	Cross, and it's dated March 28th, 2014: Subject:	17:58
22	Re: Product Partnerships: Bi-Weekly Update."	17:58
23	Do you see that?	17:58
24	A. Yes. Can I read it?	17:58
25	Q. I'm just going to ask you just about one	17:58

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1	sentence. So why don't we go to that and then if	17:59
2	you need more context to understand it, then, by all	17:59
3	means, take your time, but...	17:59
4	A. Okay.	17:59
5	Q. So in this update -- if you move down this	17:59
6	document, there's an update for "Login V4 (f8)."	17:59
7	Do you see that?	17:59
8	A. (Witness nods.)	17:59
9	Q. Then, it states "Platform" with two	17:59
10	asterisks and in parentheses "(KP and Jackie)." [As	17:59
11	read.]	
12	And I read that to suggest that you were	17:59
13	responsible for that information.	17:59
14	MR. FALCONER: Objection. Form.	17:59
15	THE WITNESS: Can I read this document	17:59
16	first?	17:59
17	BY MR. LOESER:	17:59
18	Q. Yes, please. Well, that's the only --	17:59
19	that's the only section I want to ask you about, so	17:59
20	if you want to just look at that, I will give you a	17:59
21	second. We could speed this up.	17:59
22	A. Okay.	17:59
23	Q. But look -- go ahead and look and see what	17:59
24	this -- what this email is and familiarize yourself	18:00
25	with it. That's the only part I am going to be	18:00

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1	asking you about.	18:00
2	A. Yes, I see our names next to that.	18:00
3	Q. Okay. And so on the task that you're	18:00
4	assigned to here, or for which you appear to be	18:00
5	responsible with KP, the second bullet is:	18:00
6	"Planning PR briefing dry-runs and	18:00
7	Partnership head/strategic partner	18:00
8	briefings prior to F8 to test out	18:00
9	PR messaging and maintain relationships	18:00
10	accordingly."	18:00
11	So it appears from this -- and if you look	18:00
12	at the top of the email, this is from 2014, that you	18:00
13	were specifically responsible for -- we can go back	18:01
14	to the section -- for the PR relating to the F8	18:01
15	Conference; is that right?	18:01
16	A. No. I wouldn't --	18:01
17	MR. FALCONER: Objection. Form.	18:01
18	THE WITNESS: Again, I wouldn't classify	18:01
19	that as that.	18:01
20	BY MR. LOESER:	18:01
21	Q. Okay. Tell me how you would explain the	18:01
22	second bullet which says, "Planning PR briefing	18:01
23	dry-runs and partnerships head/strategic partner	18:01
24	briefings prior to F8 to test out PR messaging and	18:01
25	maintain relationships accordingly."	18:01

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1	What does that mean?	18:01
2	MR. FALCONER: Objection. Form and	18:01
3	foundation.	18:01
4	THE WITNESS: So I don't remember	18:01
5	specifically, which is why I wouldn't say I'm tasked	18:01
6	with it. Me and KP are assigned to it, so it could	18:01
7	be a lot of different folks contributing to it. So	18:01
8	I don't remember if that's specifically me or not.	18:01
9	BY MR. LOESER:	18:01
10	Q. Okay. Well, your name is there; right?	18:02
11	A. Along with KP, yes.	18:02
12	Q. Okay. And there is a reference to "PR" for	18:02
13	the -- relating to the F8; right? Do you understand	18:02
14	that that's the F8 Conference?	18:02
15	A. Correct.	18:02
16	Q. And it references "PR briefing dry-runs."	18:02
17	Do you recall being involved in dry-runs of	18:02
18	messaging relating to that F8?	18:02
19	A. Not specifically to this F8.	18:02
20	Q. And so looking at this, this does not	18:02
21	refresh your recollection, not one little bit, about	18:02
22	your role in connection with the 2014 F8?	18:02
23	A. No.	18:02
24	Q. So, Miss Chang, do you recall that there was	18:02
25	articles written about the fact that Facebook	18:02

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1	partners continued to have access to friends data	18:02
2	after the implementation of Graph API version 2?	18:03
3	A. No. I don't know what articles you're	18:03
4	referencing to.	18:03
5	MR. LOESER: Let's go to the next exhibit.	18:03
6	(Exhibit 25 marked for identification.)	18:03
7	BY MR. LOESER:	18:03
8	Q. And this is Exhibit 25. Miss Chang, this is	18:03
9	a New York Times article from December 16th of --	18:03
10	June 3rd, 2018. "Facebook Gave Device Makers Deep	18:04
11	Access to Data on Users and Friends."	18:04
12	Do you recall when this article came out?	18:04
13	A. No.	18:04
14	Q. And would it be your normal course to find	18:04
15	out if an article was written about an area that	18:04
16	concerned work that you did at Facebook?	18:04
17	A. No. I think I would be reading articles for	18:04
18	a very long time, so I don't focus a lot on	18:04
19	articles. That would be our communications team.	18:04
20	Q. Okay. So when this article -- and the	18:04
21	subheading is:	18:04
22	"The company formed data-sharing	18:04
23	partnerships with Apple, Samsung and	18:04
24	dozens of other device makers,	18:04
25	raising new concerns about its privacy	18:04

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1	protections."	18:04
2	As we saw in the email, you were very	18:04
3	involved in the partnerships and the providing of	18:04
4	extended access to deprecated permissions.	18:04
5	But no one sent this to you and said, hey,	18:04
6	weren't you involved in this?	18:05
7	A. No.	18:05
8	MR. FALCONER: Objection. Form.	18:05
9	BY MR. LOESER:	18:05
10	Q. You've never read this article?	18:05
11	A. No.	18:05
12	Q. And you've never communicated with anyone	18:05
13	about the scandal that surfaced when people figured	18:05
14	out that this had happened?	18:05
15	A. So I don't -- I don't know.	18:05
16	Q. So now, it's not news to you that Facebook	18:05
17	reached data-sharing partnerships with at least 60	18:05
18	device makers; right? That was work you were doing	18:05
19	at Facebook, wasn't it?	18:05
20	A. No. Specifically, I didn't work in that --	18:05
21	on devices.	18:05
22	Q. Okay. But we had -- as we went through, you	18:05
23	categorized the different types of partners that	18:05
24	would continue to have access to friends	18:05
25	permissions. And having done that work, this was	18:05

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1	not an article that anyone brought to your	18:05
2	attention?	18:05
3	A. I don't remember and, again, I didn't work	18:05
4	on devices.	18:06
5	Q. So this is -- you're learning for the first	18:06
6	time as we talk right now that there was a scandal	18:06
7	regarding Facebook continuing to provide friends	18:06
8	data to various partners?	18:06
9	A. Again, I don't remember.	18:06
10	Q. A front-page New York Times article was not	18:06
11	something that came to your attention at Facebook?	18:06
12	A. There's been many, so I don't remember this	18:06
13	specific one.	18:06
14	Q. The scandals are so many that the scandal	18:06
15	with which you were personally involved doesn't	18:06
16	stand out for you?	18:06
17	MR. FALCONER: Objection --	18:06
18	THE WITNESS: I would not classify it that	18:06
19	way.	18:06
20	MR. FALCONER: -- form, foundation and it	18:06
21	misstates prior testimony.	18:06
22	BY MR. LOESER:	18:06
23	Q. I'm sorry. You can answer.	18:06
24	A. I would not state it the way you did.	18:06
25	MR. LOESER: All right. We can go to the	18:06

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1	next exhibit, 26.	18:06
2	(Exhibit 26 marked for identification.)	18:06
3	BY MR. LOESER:	18:07
4	Q. Miss Chang, we're showing you Exhibit 26,	18:07
5	which is an email from Charlotte Edelson to several	18:07
6	people, including yourself, dated August 28th, 2014:	18:07
7	Subject line, "Forward: Head Partner Apps:	18:07
8	Protective Policy Review."	18:07
9	Do you see that?	18:07
10	A. Sorry. Let me update. I see what you're	18:07
11	displaying.	18:08
12	Q. Do you know who Charlotte Edelson is?	18:08
13	A. No, I don't -- I don't remember.	18:08
14	Q. And do you know what "head partner apps"	18:08
15	are?	18:08
16	A. I don't know specifically. I just know that	18:08
17	it's likely apps that are being managed.	18:08
18	Q. Managed by Facebook people?	18:08
19	A. Managed by Facebook people, but I don't know	18:08
20	specifically --	18:08
21	Q. Okay.	
22	A. -- like which ones or who.	18:08
23	Q. All right. Let's go down the string a bit	18:08
24	to the August 13, 2014 email from Miss Edelson to,	18:08
25	among others, yourself. And you will see that	18:09

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1	Miss Edelson writes:	18:09
2	"Hi, As part of our team's Proactive	18:09
3	Policy Review efforts, we would like	18:09
4	to begin vetting head partner apps	18:09
5	for policy compliance.	18:09
6	"Our hope is that by vetting head	18:09
7	partner apps, we will be able to	18:09
8	catch violations upstream, reach	18:09
9	out to you directly, and improve	18:09
10	our internal processes and external	18:09
11	communications with developers.	18:09
12	Additionally, ensuring head partner	18:09
13	app compliance will help us clean up	18:09
14	entire Platform ecosystem (since	18:09
15	well-intentioned developers will	18:09
16	likely follow suit)."	18:09
17	Do you recall this effort to vet head	18:09
18	partner apps for policy compliance?	18:09
19	A. Not specifically.	18:09
20	Q. Do you remember anything at all about it?	18:09
21	A. Not -- not specifically.	18:09
22	Q. What about other than specifically? Do you	18:09
23	remember anything --	18:10
24	A. I mean, I see the email, but I don't	18:10
25	remember this.	18:10

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1	Q. Okay. And this email doesn't refresh your	18:10
2	recollection in any way about this subject matter?	18:10
3	A. No.	18:10
4	Q. Do you recall the effort to try to clean up	18:10
5	the entire platform ecosystem?	18:10
6	A. I -- yes, I've heard it.	18:10
7	Q. Okay. What does that refer to?	18:10
8	A. I -- so I don't remember specifically like	18:10
9	what year and in what reference. I know I've heard	18:10
10	the term.	18:10
11	Q. Okay. Well, this year for this email is	18:10
12	2014, and the reference is to "vetting head partner	18:10
13	apps for compliance." So can you describe what	18:10
14	needed to be done to clean up -- or what the	18:10
15	problems were with the ecosystem that were mentioned	18:10
16	in this email?	18:11
17	A. No, I don't know.	18:11
18	Q. Okay. In what context have you referred --	18:11
19	or heard the expression to "clean up the ecosystem	18:11
20	for the platform"?	18:11
21	A. So I don't remember. I just know I heard	18:11
22	the term.	18:11
23	Q. Do you know what the term means?	18:11
24	A. To clean up, which is like to review things.	18:11
25	Q. And so what would be -- what needed to be	18:11

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1	cleaned up?	18:11
2	A. So almost anything can be cleaned up, like	18:11
3	code could be cleaned up, you know, apps in terms of	18:11
4	like, you know -- you know, in Salesforce -- I don't	18:11
5	know. It can be used in many ways.	18:11
6	Q. What are "head partner apps"?	18:11
7	A. I -- I don't know specifically.	18:11
8	Q. Do you have any notion of what head partner	18:11
9	apps are?	18:11
10	A. A head partner, I would say, is like a	18:11
11	partner being managed, as I mentioned. Again, like	18:12
12	a managed partner.	18:12
13	Q. Okay. And is there something special about	18:12
14	a partner if it's the head partner?	18:12
15	A. I don't remember the criteria or what is	18:12
16	classified as head.	18:12
17	Q. And what do you think this means or refers	18:12
18	to "well-intentioned developers likely following	18:12
19	suit"?	18:12
20	A. I don't know.	18:12
21	Q. Okay. Did you respond to this email and	18:12
22	tell Miss Edelson that you had no idea what she's	18:12
23	talking about?	18:12
24	A. I don't know if I responded to her. I don't	18:12
25	even remember this email.	18:12

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```
 1        Q.    Do you have any understanding about how head    18:12

 2   partners were vetted?                                      18:12

 3        A.    No, I don't know.                               18:13

 4        Q.    Doesn't this email explain to you how to vet    18:13

 5   the head partners?                                         18:13

 6        A.    So this email is from the developer             18:13

 7   operations team, which I'm not part of, so I don't         18:13

 8   know their processes.                                      18:13

 9        Q.    Okay.  Do you see that underline bolded         18:13

10   thing that says, "What we need from YOU" and there's      18:13

11   a big exclamation point?                                   18:13

12        A.    Yes.                                            18:13

13        Q.    Okay.  This email was sent to you, so did       18:13

14   you read that to mean that there was something that        18:13

15   you needed to do?                                          18:13

16        A.    Well, it was sent to me amongst other           18:13

17   people, so I don't know.  There's a lot of emails          18:13

18   that are sent to me that I never responded back to         18:13

19   either.  So I don't know.  I don't remember                18:13

20   specifically.                                              18:13

21        Q.    And in 2014, did you manage any apps?           18:13

22        A.    I think so.  I'm not sure.                      18:13

23        Q.    Okay.  Well, that's a pretty good clue that     18:13

24   the "you" might have been you, because the next line       18:14

25   says:                                                      18:14
```

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1	"As a first step, we are asking that	18:14
2	you fill out a Zoho with the following	18:14
3	information for the apps you manage."	18:14
4	So do you recall ever filling out this	18:14
5	information?	18:14
6	A. I don't. So again, it says "hi," dash,	18:14
7	which is not even specific to anyone, so I don't	18:14
8	read it as to me, Jackie.	18:14
9	Q. Okay. The email ends and it says:	18:14
10	"Don't hesitate to reach out if you	18:14
11	have any questions or concerns about	18:14
12	this process."	18:14
13	And do you have any recollection of reaching	18:14
14	out and expressing any questions or concerns about	18:14
15	the process?	18:14
16	A. I don't remember.	18:14
17	Q. If you had filled out the information as you	18:14
18	were asked to do for any app that you managed, is	18:14
19	that something that would be saved somewhere at	18:14
20	Facebook?	18:14
21	A. Well, it says, I think, in the email to --	18:14
22	to use that document.	18:14
23	Q. Okay. So if you clicked on that hyperlink,	18:15
24	that would take you somewhere where you could store	18:15
25	the document?	18:15

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```
 1        A.   So I'm not storing the document, but it is     18:15

 2   through the Zoho service.                               18:15

 3        Q.   Okay.   What's the "Zoho service"?            18:15

 4        A.   It is a document service like Google Docs.    18:15

 5        Q.   Okay.   Let's look at No. 2, after the "What  18:15

 6   we need from you."   It states:                         18:15

 7             "Once you complete step 1, we will           18:15

 8             review the apps and flag any policy           18:15

 9             violations to you (no action will be          18:15

10             taken on the apps)."                          18:15

11             So can you explain to me why if policy        18:15

12   violations were identified, no action would be taken    18:15

13   on the apps?                                            18:15

14        A.   Again, I don't know.   I didn't write this    18:15

15   email.                                                  18:15

16        Q.   Do you recall the earlier presentation that  18:15

17   we went through that noted that there was no            18:15

18   appetite to enforce the policies against -- for        18:16

19   existing use of the friends permissions?               18:16

20             MR. FALCONER:   Objection.   Form.           18:16

21             THE WITNESS:   Sorry, which -- which          18:16

22   document?                                               18:16

23   BY MR. LOESER:                                          18:17

24        Q.   I would like to refer you back to            18:17

25   Exhibit 12.   If you look at the fourth page,          18:17
```

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1	"Preparing for the Deprecations." The first bullet:	18:17
2	"Pre-Enforce use existing policies	18:18
3	to revoke apps access (note: No	18:18
4	appetite to do this at present)."	18:18
5	Do you recall a conversation about there not	18:18
6	being any appetite to use existing policies to	
7	revoke apps' access to deprecated features?	18:18
8	A. I don't remember.	18:18
9	MR. LOESER: We can go to the next exhibit,	18:18
10	which I believe is 27.	18:18
11	(Exhibit 27 marked for identification.)	18:19
12	MR. LOESER: We're uploading the exhibit,	18:19
13	but it's taking a minute.	18:19
14	BY MR. LOESER:	18:19
15	Q. Okay. We're showing you "Quip Business	18:19
16	Portal," dated June 13th, 2018. Are you familiar	18:19
17	with the Quip business portal and how it works?	18:19
18	A. I know Quip, the service.	18:19
19	Q. And we mentioned it previously, but tell me,	18:19
20	what is the Quip service?	18:19
21	A. It's a document-sharing service like Google	18:19
22	Docs.	18:19
23	Q. So it allows you to work with other people	18:19
24	on a document in real time?	18:20
25	A. Yes.	18:20

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1	Q. And is this something that you frequently	18:20
2	use or not?	18:20
3	A. I've used it. I used it at whatever time	18:20
4	the service was available just because we have a lot	18:20
5	of rotating services.	18:20
6	Q. And is the -- is the service searchable?	18:20
7	A. Yes.	18:20
8	Q. How does that work?	18:20
9	A. There's a search header in the service and	18:20
10	you can search for topics.	18:20
11	Q. Do you know when Facebook started using the	18:20
12	Quip service?	18:20
13	A. I don't know exactly when.	18:20
14	Q. And is it something that's widely used at	18:20
15	Facebook?	18:20
16	A. Not now.	18:20
17	Q. When was it widely used?	18:20
18	A. I don't remember the years, but there was a	18:20
19	time where it was being used before us getting --	18:21
20	before Google Docs.	18:21
21	Q. And so it's something that Facebook stopped	18:21
22	using?	18:21
23	A. Well, they're encouraging people to stop	18:21
24	using it, but I think there are still documents	18:21
25	there.	18:21

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1	Q. Okay. And what are people now using instead	18:21
2	for the same type of functionality?	18:21
3	A. Google Docs.	18:21
4	Q. And do you use Google Docs now?	18:21
5	A. Yes.	18:21
6	Q. And when did you start using Google Docs?	18:21
7	A. I don't remember the year specifically.	18:21
8	Q. Now, somewhere in that enormous list of	18:21
9	names, you are identified. So is it unusual to have	18:21
10	so many people participating at the same time in the	18:22
11	Quip service?	18:22
12	A. So I wouldn't call it "participating."	18:22
13	People can just access it or read it.	18:22
14	Q. Okay.	
15	A. It doesn't mean that you are participating	18:22
16	in anything.	18:22
17	Q. So all those names on there are people that	18:22
18	access this particular -- I don't want to call it	18:22
19	conversation -- but work?	18:22
20	A. So I don't know enough about this service to	18:22
21	tell you how to classify -- how people are	18:22
22	referenced, so I don't know.	18:22
23	Q. If we can go to the fifth page of this	18:22
24	document, to the -- I'm going to call it an "entry"	18:22
25	because I have no idea what the terminology is, but	18:23

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1	there is a -- there's work by Suvrat Joshi. It	18:23
2	says, "Edited May 28, 2017."	18:23
3	Do you see that?	18:23
4	A. May -- May 29th, sorry, 2017?	18:23
5	Q. I think it is May 28th, but...	18:23
6	A. Oh.	18:23
7	Q. Yeah, look at the -- there we go.	18:23
8	A. Sorry. Oh, okay. Got it.	18:23
9	Q. So do you know who Suvrat Joshi is?	18:23
10	A. No.	18:23
11	Q. This outline he's creating, it says:	18:23
12	"1. Prevent public access to	18:23
13	user_id from Pages API for comments,	18:24
14	visitor posts and likes.	18:24
15	"a. Use Case/Problem to solve:	18:24
16	"i. Partner's access..."	18:24
17	Do you recall there being a problem with	18:24
18	partner access to Pages API?	18:24
19	MR. FALCONER: Objection to form.	18:24
20	THE WITNESS: No. And I think how he is	18:24
21	referencing it here is "problem to solve," not -- I	18:24
22	think you're trying to infer it differently.	18:24
23	BY MR. LOESER:	18:24
24	Q. Okay. Well, I'm just reading it. But "Use	18:24
25	Case/Problem to solve" and Roman numeral i is	18:24

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1	"Partners access."	18:24
2	What was your job at this time with regard	18:24
3	to partners?	18:24
4	A. 2017, sorry. Sorry. I almost would need a	18:24
5	refresh of my LinkedIn. [Counting to self].	18:24
6	I think I was working on Internet.org.	18:25
7	Q. 2017 -- I can't tell from your LinkedIn, but	18:25
8	2007 through September 2019, it says "Head of	
9	business partner business platform partnerships."	
10	DEPOSITION REPORTER: Can you repeat that	
11	again?	
12	BY MR. LOESER:	
13	Q. It looks like in 2017, you started with	18:25
14	Internet.org and then you transitioned to head of	18:25
15	business platform partnerships.	
16	Do you know when in the year you	18:25
17	transitioned to head of business platform	18:25
18	partnerships?	18:25
19	A. So I don't know the specific dates, and I	18:25
20	didn't come in as head of business partnership. I	18:25
21	was a partner manager and then eventually left the	18:25
22	role as head.	18:26
23	Q. Let's move down a little bit farther to the	18:26
24	1:13 p.m. work by Suvrat Joshi, at the bottom of the	18:26
25	page we are looking at.	18:26

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1	A. Okay.	18:26
2	Q. So it says:	18:26
3	"Prevent public access to user_ID	18:26
4	from Pages API for comments, visitor	
5	posts and likes."	
6	And then below that it says:	18:26
7	"a. Use," "b" is edited, and "c" is	18:26
8	"Case/Problem to solve." And this states:	18:26
9	"Partners access user level information	18:26
10	from comments, visitor posts and likes	18:26
11	from Pages API.	18:26
12	"ii. They aggregate user information	18:26
13	to create profiles and industry	18:26
14	analysis.	18:26
15	"iii. This information is used for	18:26
16	value added services like industry	18:26
17	analysis and best practices.	18:26
18	"iv. This information at times is	18:27
19	misused to create user packages for	18:27
20	sharing with other partners."	18:27
21	And was this ever something, this problem	18:27
22	with pages API, something that was raised with you?	18:27
23	A. So, again, I don't believe it's a problem.	18:27
24	It says "problem to solve." Doesn't mean that it's	18:27
25	an actual problem, but I don't -- so I don't know	18:27

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1	what the -- I have not seen this document, I don't	18:27
2	believe.	18:27
3	Q. Okay. So would you agree with me that where	18:27
4	this says, "This information at times is misused to	18:27
5	create user packages for sharing with other	18:27
6	partners," that that would be a problem for	18:27
7	Facebook?	18:27
8	A. So, again, I don't know how to infer what	18:27
9	Suvrat Joshi was meaning when he wrote that.	18:27
10	Q. Do you know what a "profile" is? How	18:27
11	does Facebook -- I'm sorry.	18:28
12	How does Facebook use the term "profile"?	18:28
13	A. So it can mean different things. There	18:28
14	could be a Facebook profile on the Facebook service.	18:28
15	You could have a profile through your internal	18:28
16	tools. You could also have like, you know, a	18:28
17	profile in enterprise software. So I don't know	18:28
18	what specifically is being referenced.	18:28
19	Q. So just to clarify the record, we've looked	18:28
20	through the list of names and we can't actually find	18:28
21	your name on that, but... so I just want to make the	18:28
22	record clear on that.	18:28
23	But nonetheless, in your role with partners,	18:28
24	this is not a problem that was ever something that	18:28
25	you evaluated?	18:28

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```
 1            DEPOSITION REPORTER:  I'm sorry.  I lost the
 2    tail on that.  "That you..."
 3            MR. LOESER:  Evaluated.                      18:28
 4            THE WITNESS:  So, again, I -- I feel like    18:28
 5    it's kind of generalized, so I don't -- I don't     18:28
 6    know.  I have not seen this, so no.                 18:28
 7            MR. LOESER:  Okay.  We can move on.          18:29
 8        Exhibit 28 is an email that will materialize    18:29
 9    momentarily.                                        18:29
10            (Exhibit 28 marked for identification.)     18:29
11    BY MR. LOESER:                                      18:29
12       Q.   So, Miss Chang, we are showing you an email 18:29
13    dated October 16th, 2019, that appears like it was  18:29
14    sent to yourself, sent from you to you and also to  18:29
15    Joel Yawili, that includes a chat message.          18:29
16            Who is Joel Yawili?                         18:30
17       A.   Joel.                                       18:30
18       Q.   Joel.                                       18:30
19       A.   He was someone on the team and reported to  18:30
20    me at some point in time.  I don't remember the     18:30
21    exact period of time.                               18:30
22       Q.   Okay.  This chat says, "Hi Jackie, re:  The 18:30
23    Groups SEV that Eli mentioned to you."              18:30
24            What is that "groups SEV"?                  18:30
25       A.   Groups SEV.                                 18:30
```

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1	Q. What does that mean?	18:30
2	A. Severe -- severe -- so I don't know the	18:30
3	specific acronym.	18:30
4	Q. Whatever it is, it is severe?	18:30
5	A. It's an -- it's an issue, like if something	18:30
6	breaks.	18:30
7	Q. Okay. And take a minute to look at the	18:30
8	chat, and then you can tell me what it is that broke	18:30
9	that is being discussed here.	18:31
10	A. Okay.	18:32
11	Q. Okay. So do you have an understanding of	18:32
12	what the "Groups SEV" discussed in this chat is?	18:32
13	A. I don't know it in specific details, but I	18:32
14	can glean from the TLDR section.	18:32
15	Q. Okay. What have you gleaned?	18:32
16	A. It says that when -- or sorry, we then -- or	18:32
17	sorry -- April 2018, we announced that we were	18:32
18	removing user data from the groups API. We then	18:32
19	created GKs to allow a subset of apps to retain	18:32
20	access to the fields we had deprecated. This GK was	18:32
21	later migrated over to capabilities. This week we	18:32
22	found out that, unfortunately, those capabilities	18:32
23	are still allowing those apps to access the user	18:32
24	data we had stated were deprecated last year."	18:32
25	Q. Okay. And do you know what the "Groups API"	18:32

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1	is?	18:32
2	A. Not the -- I don't -- I don't know enough to	18:33
3	know what it does exactly.	18:33
4	Q. Okay. If you look up the chat a bit, at one	18:33
5	point, you state:	18:33
6	"I don't need to be on the thread but	18:33
7	would love a TLDR to better understand	18:33
8	the issue."	18:33
9	What does that mean?	18:33
10	A. I just wanted to get an understanding of	18:33
11	what exactly the issue was, since I think at that	18:33
12	time, I was just starting to, I guess, jump back in	18:33
13	to some of the platform stuff, so I didn't have full	18:33
14	context on a lot of things.	18:33
15	Q. Okay. And do you recall getting a better	18:33
16	understanding of this issue?	18:33
17	A. I don't think so because I -- I mean, what I	18:33
18	said is probably just to point him to KP, since KP	18:33
19	was working on it, and I figured he would have more	18:33
20	historical context.	18:33
21	Q. What does "this GK was later migrated over	18:33
22	to capabilities" mean?	18:34
23	A. I don't know.	18:34
24	Q. And "GK" is gatekeeper, you testified	18:34
25	earlier; right?	18:34

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1	A. Yes.	18:34
2	Q. And so you don't have any understanding of	18:34
3	what it means to migrate gatekeeper over to	18:34
4	capabilities?	18:34
5	A. Correct. I'm not the engineer who does it,	18:34
6	so I don't know what it exactly means or entails.	18:34
7	Q. Okay. And what you read at the bottom of	18:34
8	that chat was:	18:34
9	"We then created GKs to allow a	18:34
10	subset of apps to retain access to	18:34
11	the fields we had deprecated...This	18:34
12	week we found out that unfortunately	18:34
13	those capabilities are still allowing	18:34
14	those apps to access the user data we	
15	had stated were deprecated last year."	18:34
16	So do you have any idea of how this problem	18:35
17	was solved?	18:35
18	A. I don't specifically.	18:35
19	Q. So who would be responsible for	18:35
20	investigating why a deprecated capability would	18:35
21	still be working?	18:35
22	A. So I don't know specifically, but I would go	18:35
23	to an engineer. But I don't know specific to this	18:35
24	case.	18:35
25	Q. Miss Chang, what do you know about the	18:35

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1	Cambridge Analytica scandal on Facebook?	18:35
2	A. What I know is what I've read, which is	18:36
3	dealing with like a researcher taking the	18:36
4	information and selling it to, I believe, a	18:36
5	Cambridge Analytica, which is a political agency.	18:36
6	Q. And the researcher was Aleksandr Kogan; is	18:36
7	that right?	18:36
8	A. I believe that's his name.	18:36
9	Q. And the problem started with an app that	18:36
10	obtained a whole lot of friends data; is that right?	18:36
11	A. So I don't know the specifics of it.	18:36
12	Q. And how many articles would you say you've	18:36
13	read about the Cambridge Analytica scandal?	18:36
14	A. I don't know.	18:36
15	Q. Have there been any briefings internal to	18:36
16	Facebook that you attended to which the Cambridge	18:37
17	Analytica scandal was discussed?	18:37
18	A. I don't recall.	18:37
19	Q. Do you recall whether it was -- that was a	18:37
20	significant event at Facebook?	18:37
21	A. Yes.	18:37
22	Q. And did you ever cross paths with Aleksandr	18:37
23	Kogan or Cambridge Analytica in your work with	18:37
24	partners or researchers?	18:37
25	A. Sorry, like him physically or...	18:37

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1	Q. No, just in your work. Or the partners or	18:37
2	was that a researcher that you ever interacted with	18:37
3	in your job at Facebook?	18:37
4	A. No.	18:37
5	Q. Are you --	
6	A. I did not interact with him. Sorry.	18:37
7	Q. I'm sorry. Go ahead.	18:37
8	A. Oh, I said, I did not interact with him.	18:37
9	Q. Have you ever worked with political	18:37
10	advertisers?	18:37
11	A. Not to my knowledge.	18:37
12	Q. Are you aware that Facebook worked with	18:37
13	Cambridge Analytica during the 2016 Presidential	18:38
14	campaign?	18:38
15	A. So I don't know the details enough to -- I	18:38
16	don't know.	18:38
17	Q. That's not something that you were	18:38
18	particularly interested in learning about?	18:38
19	A. No.	18:38
20	Q. Now, you understand that the Cambridge	18:38
21	Analytica scandal had to do with the ability of an	18:38
22	app to obtain content information about the app	18:38
23	user's friends; right?	18:38
24	A. So, again, I don't know the details enough	18:38
25	where I would say I know that.	18:38

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1	Q. So that's not something that you've gleaned	18:38
2	from the pending article you have read about the	18:38
3	Cambridge Analytica scandal?	18:39
4	A. I don't feel comfortable making that	18:39
5	assumption, so I don't know. I don't remember those	18:39
6	words exactly or anything.	18:39
7	Q. Okay. Did you read that it started with a	18:39
8	This is a Your Digital Life app that a hundred and	18:39
9	something thousand people downloaded, and from that,	18:39
10	content information was obtained for 87 million	18:39
11	Facebook users?	18:39
12	A. I don't know that specifically.	18:39
13	Q. Is that generally your understanding of what	18:39
14	happened?	18:39
15	A. Not to that specificity, but so like I said	18:39
16	earlier, the information that he sold.	18:39
17	Q. Okay. But is it your general understanding	18:39
18	that a relatively small number of people used an	18:39
19	app, and from that app, a very large number of	18:39
20	people ended up having their information obtained by	18:39
21	that app?	18:39
22	A. So, again, I -- I don't know specifically.	18:39
23	Q. I'm not asking you specifically. I'm just	18:40
24	asking just for the very most basic of your	18:40
25	understanding of the problem.	18:40

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1	And do you have any understanding that a	18:40
2	small number or relatively small number of app users	18:40
3	caused a relatively large number of Facebook users	18:40
4	to share their information with the app?	18:40
5	A. So as you said, it's all relative, which is	18:40
6	why I don't feel comfortable making assertions on	18:40
7	how relative it is because I don't know in detail to	18:40
8	make that assumption.	18:40
9	Q. So you're saying that you can't testify to	18:40
10	any degree or in any way about whether the This is	18:40
11	Your Digital Life app was downloaded by a relatively	18:40
12	small number of people and, because of that, a whole	18:40
13	lot of people had their information shared with the	18:40
14	app who did not download the app? That's not	18:40
15	something that kind of jumped out at you from	18:40
16	reading anything about this scandal?	18:40
17	MR. FALCONER: Objection. Asked and	18:40
18	answered.	18:40
19	THE WITNESS: So those are your words and I	18:40
20	don't know if that's what was stated. I don't know	18:40
21	in specificity where I would stand behind that,	18:41
22	especially if I'm supposed to testify to what I	18:41
23	know. So I don't know that specifically.	18:41
24	BY MR. LOESER:	18:41
25	Q. And do you understand that it was friends	18:41

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1	permissions that are at the heart of the ability of	18:41
2	the This is Your Digital Life app to obtain content	18:41
3	information for so many Facebook users?	18:41
4	A. So I don't know.	18:41
5	Q. Okay. And that's not something that you	18:41
6	thought you should look into, notwithstanding all	18:41
7	the work you did with the deprecation of friends	18:41
8	permissions?	18:41
9	A. So I didn't work on that specifically and	18:41
10	that's not my job to investigate.	18:41
11	Q. You did a lot of work on sorting out which	18:41
12	partners should continue to have access to friends	18:41
13	permissions; right?	18:41
14	A. So I sorted, but I think you were implying I	18:41
15	was investigating, which I was not.	18:41
16	Q. Okay. You say you "sorted." But you	18:41
17	provided recommendations, you dealt with format, you	18:42
18	did a lot of work to figure out how Facebook should	18:42
19	decide which partners continued having access to	18:42
20	friends permissions; right?	18:42
21	A. I did it within that context, but I think	18:42
22	what you're inferring is that, and I did not work on	18:42
23	that Cambridge Analytica.	18:42
24	Q. I understand you didn't work on Cambridge	18:42
25	Analytica. I'm just trying to understand your	18:42

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1	reaction to Cambridge Analytica. Cambridge	18:42
2	Analytica had to do with friends sharing and friends	18:42
3	permissions, and you did an extraordinary amount of	18:42
4	work, as your emails show, sorting out which	18:42
5	partners should continue to have access to friends	18:42
6	permissions.	
7	So is that true that you did, in fact, work	18:42
8	on sorting out which partners should continue to	18:42
9	have access to friends permissions?	18:42
10	MR. FALCONER: Objection to form.	18:42
11	THE WITNESS: So I think you are connecting	18:42
12	the two, and I don't know enough to make that	18:42
13	assertion. And I wouldn't position it as that, as	18:42
14	how you are framing it.	18:43
15	BY MR. LOESER:	18:43
16	Q. Okay. So after the Cambridge Analytica	18:43
17	scandal broke and there were articles written about	18:43
18	how it was through friends permissions that	18:43
19	Cambridge Analytica got so much information, you	18:43
20	never went back and thought to yourself, you know, I	18:43
21	have been doing all this work on extending access to	18:43
22	friends permissions, maybe I should revisit this	18:43
23	subject?	18:43
24	MR. FALCONER: Objection. Form.	18:43
25	THE WITNESS: No. I -- I was not focused on	18:43

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1	Cambridge Analytica to do any exploration around it.	18:43
2	MR. LOESER: We can go to Exhibit 29.	18:43
3	(Exhibit 29 marked for identification.)	18:43
4	BY MR. LOESER:	18:44
5	Q. Miss Chang, Exhibit 29 is an email from	18:44
6	Jackie Rooney, dated March 22nd, 2018, to the mteam.	18:44
7	What is the "mteam"?	18:44
8	A. I don't know the exact definition, but it's	18:44
9	the leadership group.	18:44
10	Q. Okay. Are you in that group?	18:44
11	A. No.	18:44
12	Q. Okay. And "Internal Comms DL," do you know	18:44
13	what that is?	18:44
14	A. No.	18:44
15	Q. This subject is, "Q & A Briefing for March	18:44
16	23, 2018."	18:44
17	Is this the kind of briefing that you would	18:44
18	attend or that you would listen to? How are these Q	18:45
19	and A briefings handled?	18:45
20	A. So I don't know. I don't attend all of	18:45
21	them.	18:45
22	Q. Do you attend any of them?	18:45
23	A. Probably a couple.	18:45
24	Q. And why don't you spend a minute to look	18:45
25	through this one, and you can tell me if you	18:45

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1	attended this one.	18:45
2	A. I don't know.	18:45
3	Q. Why don't we go to the very last page of	18:45
4	that briefing. It says at the top of the page,	18:45
5	"Cheryl will tell her 10-year" -- I don't know how	18:46
6	to say that -- "Faceversary story from MPK."	18:46
7	And then it says, "11 years Jackie Chang."	18:46
8	So it appears they were going to celebrate	18:46
9	your 11 years at Facebook?	18:46
10	A. Yes.	18:46
11	Q. Do you recall anyone congratulating you in a	18:46
12	briefing on your 11 years at Facebook?	18:46
13	A. I mean, I don't know that one specifically.	18:46
14	They tend you call you out every Faceversary, so I	18:46
15	don't know if this specific one.	18:46
16	Q. Okay. Let's go to the first page. March	18:46
17	22nd, 2018, this is obviously right on the heels of	18:46
18	the Cambridge Analytica scandal. And the first --	18:46
19	second heading down at the bottom of the page is	18:46
20	"Suggested Guidance."	18:46
21	"What is the message we would like	18:46
22	to send out from employees to their	18:47
23	friends and family without constituting	18:47
24	a leak of internal info?"	18:47
25	Could you read the third bullet.	18:47

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1	A. "We took action in 2014 to dramatically	18:47
2	limit the data apps could access but we	18:47
3	also made mistakes. This was a	18:47
4	violation of trust between Facebook and	18:47
5	the people who use our service."	18:47
6	Q. Now, this reference to taking action in 2014	18:47
7	"to dramatically limit the data apps could access,"	18:47
8	does that appear to you to be the reference to the	18:47
9	deprecation of various permissions, including	18:47
10	friends permissions, with the introduction of the	18:47
11	new platform?	18:47
12	MR. FALCONER: Objection. Form.	18:47
13	THE WITNESS: I don't know specifically if	18:47
14	it's referencing that. It could be referencing a	18:47
15	lot of different initiatives.	18:47
16	BY MR. LOESER:	18:47
17	Q. Can you think of any other initiative, other	18:47
18	than the one that we just spent hours going through,	18:47
19	that related to limiting the data apps could access?	18:47
20	MR. FALCONER: Objection. Form.	18:48
21	THE WITNESS: So I don't know what the	18:48
22	product teams and engineering teams would do in	18:48
23	detail. I don't track every single thing.	18:48
24	BY MR. LOESER:	18:48
25	Q. But as a Facebook employee working in	18:48

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1	partners, working on the transition to the new	18:48
2	platform, you're certainly aware that in 2014, a new	18:48
3	platform was introduced and that platform deprecated	18:48
4	a number of permissions; right?	18:48
5	A. I don't know specifically if that's what	18:48
6	it's communicating in this email.	18:48
7	Q. Now, this says, "But we also made mistakes."	18:48
8	Do you know what mistakes this bullet is	18:48
9	referring to in connection with dramatically	18:48
10	limiting the data apps could access?	18:48
11	MR. FALCONER: Objection. Form and	18:48
12	foundation.	18:48
13	THE WITNESS: I don't know what specific	18:48
14	mistakes it's referring to.	18:48
15	BY MR. LOESER:	18:48
16	Q. And this says:	18:48
17	"This was a violation of trust between	18:49
18	Facebook and the people who use our	18:49
19	service."	18:49
20	Now, is that a reference to continuing to	18:49
21	allow access to permissions that Facebook stated	18:49
22	would no longer be provided?	18:49
23	MR. FALCONER: Same objections.	18:49
24	THE WITNESS: Again, I don't know to make	18:49
25	that conclusion. I don't -- I don't know if that's	18:49

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 1   the intention of whoever wrote this.                  18:49

 2   BY MR. LOESER:                                        18:49

 3       Q.   So this is a blank slate for you as well     18:49

 4   then, whether -- whether mistakes were made with the  18:49

 5   introduction in 2014 of a platform that dramatically  18:49

 6   limited the data apps to access?                      18:49

 7       A.   In the context of making assumptions of what 18:49

 8   I know, the person who wrote this, I don't know.      18:49

 9       Q.   And you don't recall any briefing in which   18:49

10   anyone at Facebook talked about mistakes being made   18:49

11   with regard to the continued access that some         18:49

12   partners had to friends permissions?                  18:49

13       A.   So, again, I don't remember specifically.    18:50

14       Q.   Now, Miss Chang, you're certainly aware that 18:50

15   exceptions were made that allowed some apps and       18:50

16   partners to continue having access to deprecated      18:50

17   permissions; right?                                   18:50

18           DEPOSITION REPORTER:  I'm sorry.  Excuse me.  18:50

19   I need that question again.                            18:50

20           "Now, Miss Chang, you're certainly aware      18:50

21   exceptions were made that allowed..."                 18:50

22           MR. LOESER:  Some apps and partners to have   18:50

23   access to deprecated permissions.                     18:50

24           THE WITNESS:  To what that email said,        18:50

25   whatever we were looking in the past.                 18:50
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 1   BY MR. LOESER:                                      18:50

 2       Q.   So that's yes, you're aware that exceptions  18:50

 3   were made that allowed some apps and partners to    18:50

 4   continue to having access to deprecated permissions, 18:50

 5   specifically --                                     18:50

 6       A.   I wasn't -- I wasn't aware personally as I  18:50

 7   don't remember, but I've read the emails you've been 18:51

 8   sharing.                                            18:51

 9       Q.   And you see that that, in fact, happened;  18:51

10   correct?                                            18:51

11           MR. FALCONER:  Objection.  Form and         18:51

12   foundation.                                         18:51

13           THE WITNESS:  I don't know.  I don't know   18:51

14   what happened after.                                18:51

15   BY MR. LOESER:                                      18:51

16       Q.   Miss Chang, please tell the jury what you  18:51

17   did to make sure that Facebook users were notified  18:51

18   that after friend permissions were deprecated, a    18:51

19   number of developers and partners continued to have 18:51

20   access to friend permissions.                       18:51

21           MR. FALCONER:  Objection.  Form and         18:51

22   foundation.                                         18:51

23           THE WITNESS:  So, again, I don't know.      18:51

24   BY MR. LOESER:                                      18:51

25       Q.   You don't know what you did to inform users 18:51
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1	of the -- that some apps and partners had continued	18:51
2	access to friend permissions?	18:51
3	A. Yes, I don't know. I think you're -- I	18:51
4	think the question is very broad, so I don't know	18:51
5	what you're inferring.	18:51
6	Q. Miss Chang, did you do anything at all to	18:52
7	make sure that Facebook users were notified that	18:52
8	after friend permissions were deprecated, a number	18:52
9	of developers and partners continued to have access	18:52
10	to friend permissions?	18:52
11	MR. FALCONER: Same objections.	18:52
12	THE WITNESS: So I don't think I personally	18:52
13	did anything. I don't know.	18:52
14	BY MR. LOESER:	18:52
15	Q. You either did something or you didn't.	18:52
16	A. Or I don't know.	18:52
17	Q. How could you not know whether you did	18:52
18	something or not?	18:52
19	MR. FALCONER: Objection. Argumentative.	18:52
20	THE WITNESS: Because I don't remember.	18:52
21	BY MR. LOESER:	18:52
22	Q. Okay. So are you saying to the jury that	18:52
23	you might have done something to inform Facebook	18:52
24	users that after friend permissions were deprecated,	18:52
25	the number of developers, partners continued to have	18:52

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1	access to friend permissions?	18:52
2	A. No.	18:52
3	MR. FALCONER: Objection. Form. Asked and	18:52
4	answered.	18:52
5	THE WITNESS: No. I'm saying I don't	18:52
6	remember.	18:52
7	BY MR. LOESER:	18:52
8	Q. Isn't it a fact, Miss Chang, that you did	18:52
9	not do anything to inform Facebook users that after	18:52
10	friend permissions were deprecated, a number of	18:53
11	partners and developers continued to have access to	18:53
12	friend permissions?	18:53
13	MR. FALCONER: Objection. Form. Objection.	18:53
14	Asked and answered.	18:53
15	THE WITNESS: Again, I don't remember.	18:53
16	MR. LOESER: Why don't we take a 10-minute	18:53
17	break. We'll go through --	18:53
18	MR. FALCONER: Can we make it 5? I know	18:53
19	Miss Chang has some obligations she needs to attend	18:53
20	to this evening, so the quicker we can finish up,	18:53
21	the better.	18:53
22	MR. LOESER: Sure. That's fine.	18:53
23	THE VIDEOGRAPHER: This marks the end of	18:53
24	media No. 6 in the deposition of Jackie Chang. Off	18:53
25	the record. The time is 6:53.	18:53

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1	(Off the record.)	18:53
2	THE VIDEOGRAPHER: This marks the beginning	18:59
3	of media No. 7 in the deposition of Jackie Chang.	18:59
4	Back on the record. The time is 6:59.	18:59
5	MR. LOESER: Miss Chang, I have no further	18:59
6	questions for you at this time. However, I will	18:59
7	note for the record that we are evaluating the	18:59
8	transcript and the testimony in light of Special	19:00
9	Master Garrie's comments, and we will communicate	19:00
10	with your counsel as to whether we intend to recall	19:00
11	you.	19:00
12	And with that, I know you have something	19:00
13	else to do for tonight so we can close for the	19:00
14	evening.	19:00
15	MR. FALCONER: Yeah, I mean, if there are	19:00
16	other questions, I think Miss Chang is available to	19:00
17	answer them now.	19:00
18	MR. LOESER: Well, Counsel, a couple minutes	19:00
19	ago, you told me that she needed to leave so I was	19:00
20	trying to do her the courtesy of allowing that to	19:00
21	happen.	19:00
22	If we have other questions, it would be	19:00
23	based upon our review of the testimony and the	19:00
24	discussion of certain exhibits, so it will take us a	19:00
25	bit to sort that out. And I don't want to make a	19:00

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1	rash decision, so we will just reserve our rights	19:00
2	under that and with regard to Special Master	19:00
3	Garrie's comments and get back to you.	19:00
4	MR. FALCONER: Sure. And we will reserve	19:00
5	all rights as well. I can't remember what the	19:00
6	protocol says about whether we need to say we are	19:00
7	going to read and sign, so I will state it, we will	19:01
8	read and sign, and we will reserve questions.	19:01
9	MR. LOESER: Okay. Thank you, Miss Chang, I	19:01
10	appreciate your time today. And, Russ, I appreciate	19:01
11	your involvement as well. It is a good start to a	19:01
12	lot of depositions that will be taken in terms of	19:01
13	the counsel communicating clearly and effectively	19:01
14	without wasting a lot of time on the record, so I	19:01
15	really appreciate that.	19:01
16	THE VIDEOGRAPHER: Is there anything else we	19:01
17	need on the record before I close out?	19:01
18	DEPOSITION REPORTER: Counsel, I need	19:01
19	orders. I know Gibson Dunn has a three-day expedite	
20	and a rough. What is your order?	
21	MS. WEAVER: We'd like the same.	
22	DEPOSITION REPORTER: Thank you. Who was	
23	it that said that? I'm sorry.	
24	MS. WEAVER: It's God. No, it's Lesley	
25	Weaver, and I apologize.	

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1	DEPOSITION REPORTER: Thank you. I'm	19:01
2	ready.	19:01
3	THE VIDEOGRAPHER: Okay. We are off the	19:01
4	record at 7:01 p.m. and this concludes today's	19:01
5	testimony given by Jackie Chang. The total number	19:01
6	of media units used was seven and will be retained	19:01
7	by Veritext Legal Solutions.	19:02
8	(Off the record.)	19:02
9	DEPOSITION REPORTER: We're back on the	19:02
10	record.	19:02
11	MR. FALCONER: Facebook requests a	19:02
12	provisional confidentiality designation for the	19:02
13	transcript from today.	19:02
14	MR. LOESER: Understood.	19:02
15	(Ending time: 7:02 p.m.)	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

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1

2

3

4

5   I, Jackie Chang, do hereby declare under

6   penalty of perjury that I have read the foregoing

7   transcript; that I have made corrections as appear

8   noted, in ink, initialed by me, or attached hereto; that

9   my testimony as contained herein, as corrected, is true

10   and correct.

11   EXECUTED this _____ day of _____,

12   2021, at _____, _ _____.

13   (City)   (State)

14

15

16

17   Jackie Chang

18

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CONFIDENTIAL

1   I, JANIS JENNINGS, CSR No. 3942, Certified

2   Shorthand Reporter, certify:

3   That the foregoing proceedings were taken

4   before me at the time and place therein set forth, at

5   which time the witness was duly sworn by me;

6   That the testimony of the witness, the

7   questions propounded, and all objections and statements

8   made at the time of the examination were recorded

9   stenographically by me and were thereafter transcribed;
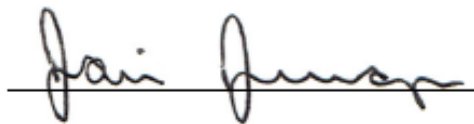
10   That the foregoing pages contain a full, true

11   and accurate record of all proceedings and testimony.

12   Pursuant to F.R.C.P. 30(e)(2) before

13   completion of the proceedings, review of the transcript

14   [X] was [ ] was not requested.

15   I further certify that I am not a relative or

16   employee of any attorney of the parties, nor financially

17   interested in the action.

18   I declare under penalty of perjury under the

19   laws of California that the foregoing is true and

20   correct.

21   Dated: 12/21/2021

22

23   _____

24   JANIS JENNINGS, CSR NO. 3942

25   CLR, CCRR

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1   RUSSELL H. FALCONER, ESQ.

2   rfalconer@gibsondunn.com

3   December 21, 2021

4   RE: IN RE: FACEBOOK, INC. CONSUMER

5   PRIVACY USER PROFILE LITIGATION

6   12/16/2021, JACKIE CHANG, JOB NO. 49769494

     The above-referenced transcript has been

7   completed by Veritext Legal Solutions and

8   review of the transcript is being handled as follows:

9   __ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext

10   to schedule a time to review the original transcript at

11   a Veritext office.

12   __ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF

13   Transcript - The witness should review the transcript and

14   make any necessary corrections on the errata pages included

15   below, notating the page and line number of the corrections.

16   The witness should then sign and date the errata and penalty

17   of perjury pages and return the completed pages to all

18   appearing counsel within the period of time determined at

19   the deposition or provided by the Code of Civil Procedure.

20   __ Waiving the CA Code of Civil Procedure per Stipulation of

21   Counsel - Original transcript to be released for signature

22   as determined at the deposition.

23   __ Signature Waived - Reading & Signature was waived at the

24   time of the deposition.

25

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CONFIDENTIAL

1   _X_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF

2   Transcript - The witness should review the transcript and

3   make any necessary corrections on the errata pages included

4   below, notating the page and line number of the corrections.

5   The witness should then sign and date the errata and penalty

6   of perjury pages and return the completed pages to all

7   appearing counsel within the period of time determined at

8   the deposition or provided by the Federal Rules.

9   __ Federal R&S Not Requested - Reading & Signature was not

10   requested before the completion of the deposition.

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1   IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION

2   JACKIE CHANG (JOB NO. 4976949)

3   E R R A T A   S H E E T

4   PAGE_____ LINE_____ CHANGE_____

5   _____

6   REASON_____

7   PAGE_____ LINE_____ CHANGE_____

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17   _____

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19   PAGE_____ LINE_____ CHANGE_____

20   _____

21   REASON_____

22

23   _____   _____

24   WITNESS   Date

25

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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